

VERIFIED MOTION FOR ADMINISTRATIVE RECONSIDERATION, VACATUR, AND CLARIFICATION OF THE APRIL 28, 2026 ADMINISTRATIVE DETERMINATION

Pronto Corporation ("Pronto"), through its undersigned President and Chief Executive Officer, respectfully moves the Office of Chief Counsel of the Federal Transit Administration ("FTA") to reconsider, vacate, and clarify the Administrative Determination issued by the Charter Service Ombudsman on April 28, 2026 concerning the Oregon Country Fair ("OCF") shuttle service requested by Lane Transit District ("LTD").

This Motion is not intended to relitigate the underlying Charter Rule dispute, nor is it submitted merely because Pronto disagrees with the outcome reached by the Ombudsman.

Rather, reconsideration is warranted because the April 28 Determination reaches factual conclusions and legal interpretations that are unsupported by, and in several respects contrary to, the evidence, arguments, and legal issues that were already before the Federal Transit Administration when the Determination was issued.

Rather than addressing the material questions presented by LTD's Request for Advisory Opinion and Pronto's April 12, 2026, Response, the Determination omits discussion of substantial evidence contained in the administrative record, does not reconcile conflicting facts, and leaves unanswered several legal questions that are central to the proper application of 49 CFR Part 604. As a result, the Determination does not provide a sufficient legal or factual basis upon which LTD may reclaim the Oregon Country Fair shuttle service under §604.9.

Pronto submitted its comprehensive Response to LTD's Request for Advisory Opinion on April 12, 2026. That Response was accompanied by extensive supporting documentation and a written complaint describing LTD's conduct during the Charter Notice process. Those materials were delivered to both FTA and LTD more than two weeks before the April 28 Determination.

Pronto acknowledges that its April 12 complaint was submitted together with its Response to the Advisory Opinion request rather than as a standalone complaint pursuant to 49 CFR §604.27. Pronto has now corrected that procedural deficiency by filing a Formal Complaint under Subpart F. That Complaint, together with Pronto's April 12 Response and accompanying exhibits, is incorporated herein by reference.

This Motion concerns a separate issue.

It concerns whether the April 28 Administrative Determination is legally and factually sustainable based upon the complete administrative record that was before the Ombudsman when the Determination was issued.

I. THE APRIL 28 DETERMINATION DOES NOT ADDRESS THE COMPLETE ADMINISTRATIVE RECORD

The April 28 Determination discusses only one aspect of Pronto's April 12 Response—Pronto's request to lease LTD vehicles pursuant to 49 CFR §604.8.

The Determination does not address the balance of Pronto's submission, including:

- Pronto's continuing affirmative response to LTD's Charter Notice;
- Pronto's repeated representations that it remained ready, willing, and able to provide the requested service;
- Pronto's partnership with MTR Western and the operational planning undertaken over several months;
- Pronto's demand-responsive operating model and detailed deployment plans;
- Pronto's proposals to Oregon Country Fair after the motorcoach option was initially declined;
- Pronto's allegations concerning LTD's conduct during the Charter Notice process; and
- Pronto's legal analysis concerning the applicability of §§604.8 and 604.9.

Each of these matters was presented to FTA before the April 28 Determination was issued.

The Determination neither discusses nor reconciles this evidence, nor does it explain why those factual and legal issues were not material to the advisory request.

Rather than repeating those arguments here, Pronto respectfully incorporates by reference its April 12 Response, its Formal Complaint, and all accompanying exhibits.

II. THE DETERMINATION IMPROPERLY SUBSTITUTES COMMERCIAL JUDGMENT FOR THE LEGAL INQUIRY REQUIRED UNDER PART 604

The April 28 Determination appears to conclude that Pronto was unable to provide the requested transportation service because Oregon Country Fair declined the motorcoach proposal and LTD declined Pronto's request to lease transit vehicles.

Respectfully, neither conclusion follows from the administrative record.

Pronto has never asserted that Oregon Country Fair was obligated to accept the motorcoach proposal. The customer remained entirely free to determine the transportation solution it preferred.

Likewise, Pronto recognizes that LTD elected not to lease its transit vehicles pursuant to §604.8 and that the leasing issue was properly addressed in the advisory proceeding.

Those decisions, however, were not the legal questions before the Federal Transit Administration.

The issue before FTA was not whether Oregon Country Fair should select motorcoaches rather than transit buses, whether it should trim trees, or whether one operational alternative was commercially preferable to another.

The issue before FTA was whether Pronto, as a registered Charter Service Provider responding to LTD's Charter Notice, had demonstrated a credible, commercially reasonable, and operationally feasible plan to provide the requested charter service.

The administrative record established substantial evidence that it had.

Pronto demonstrated more than twenty years of experience operating complex charter and special-event transportation services. It partnered with MTR Western, conducted site visits, analyzed historical ridership, developed demand-responsive operating plans, submitted pricing proposals, obtained tree-trimming estimates, and presented multiple operational alternatives designed to preserve a private-sector solution.

One alternative was ultimately declined by the customer.

The other was denied by LTD.

Neither decision negated Pronto's qualifications, terminated its affirmative response to the Charter Notice, or rendered Pronto unable to perform.

By treating those independent business decisions as dispositive of Pronto's operational capability, the April 28 Determination effectively substituted a commercial judgment for the legal inquiry required under Part 604.

FTA's responsibility was not to determine which transportation proposal Oregon Country Fair should accept.

Its responsibility was to determine whether Pronto satisfied the requirements applicable to a responding Charter Service Provider under Part 604.

The Determination does not perform that analysis.

III. THE DETERMINATION DOES NOT EXPLAIN HOW LTD COULD PROPERLY INVOKE §604.9

This issue lies at the heart of the advisory proceeding.

Throughout the Charter Notice process, Pronto remained continuously engaged with Oregon Country Fair.

Pronto responded affirmatively to LTD's Charter Notice.

Pronto never withdrew that response.

Pronto worked directly with Oregon Country Fair over several months, partnered with MTRWestern, developed demand-responsive operating plans, submitted pricing, proposed multiple operational alternatives, and repeatedly advised OCF, LTD, and FTA that it remained ready, willing, and able to provide the requested transportation service.

These facts are not disputed.

Under these circumstances, Pronto respectfully requests clarification of one central legal question:

Upon what statutory or regulatory authority could LTD properly invoke §604.9 and reclaim the service while Pronto's affirmative response remained active and Pronto continued to pursue the opportunity?

The April 28 Determination does not identify the factual event that terminated Pronto's participation.

It does not conclude that Pronto withdrew.

It does not conclude that Pronto abandoned negotiations.

It does not conclude that Pronto ceased communicating with the customer.

Instead, it concludes that Pronto could not perform because one operational alternative was rejected by the customer and another was rejected by LTD.

Respectfully, those conclusions do not answer the legal question presented by §604.9.

If a registered Charter Service Provider may respond affirmatively to a Charter Notice, devote months to planning, remain continuously engaged with the customer, present multiple commercially viable alternatives, and repeatedly reaffirm its willingness and ability to perform, yet nevertheless be treated as though it never meaningfully responded to the Charter Notice, then the protections afforded by 49 U.S.C. §5323(d) and 49 CFR Part 604 become illusory.

Pronto respectfully submits that there is absolutely no evidence or facts to support the April 28 Determination that §604.9 is applicable in this case.

IV. RECONSIDERATION, VACATUR, AND CLARIFICATION ARE WARRANTED

This Motion does not ask the Office of Chief Counsel to determine which transportation proposal Oregon Country Fair should have accepted.

It does not ask the Office to require LTD to lease its vehicles.

It does not ask FTA to substitute its commercial judgment for that of the customer.

Rather, this Motion asks the Office of Chief Counsel to answer the legal questions presented by LTD's Request for Advisory Opinion and by Pronto's April 12 Response.

Specifically:

- Did Pronto satisfy the requirements applicable to a responding Charter Service Provider under Part 604?

- Did Pronto remain an active, ready, willing, and able respondent throughout the Charter Notice process?
- If yes, upon what statutory or regulatory authority could LTD reclaim the Oregon Country Fair shuttle service pursuant to §604.9?
- What legal basis supports the conclusion that Pronto was unable to perform given the substantial and irrefutable evidence, facts and records submitted by Pronto (Exhibit C.1, C.2, C.3)?

The April 28 Determination does not provide answers to these questions.

Instead, it reaches conclusions that are not reconciled with the administrative record before the Ombudsman while leaving the central legal questions unresolved.

Accordingly, Pronto respectfully requests that the Office of Chief Counsel:

1. Vacate the April 28, 2026, Administrative Determination;
2. Reconsider LTD's Request for Advisory Opinion based upon the complete administrative record;
3. Clarify the legal questions presented in this Motion; and
4. Issue a revised determination that addresses the evidence, legal arguments, and issues presented in Pronto's April 12 Response and incorporated herein by reference.

The issue presented by this Motion is not whether FTA reached the correct conclusion; it is whether the April 28 Determination provides a legal and factual base supported by the complete administrative record already presented to the FTA before it made the determination, to support the conclusions it reached.

As summarized in Appendix A, the April 28 Determination is not supported by evidence, facts, and records shared by Pronto on the key points most relevant to the OCF Shuttle Service.

Conclusion

The issues presented by this Motion extend well beyond the Oregon Country Fair shuttle service.

The April 28 Determination establishes an administrative precedent concerning the interpretation and application of 49 CFR Part 604 that will be relied upon by transit agencies, private operators, and future advisory proceedings throughout the country. For that reason, the legal and factual foundation supporting the Determination should be complete, transparent, and firmly grounded in the administrative record.

Pronto respectfully submits that the April 28 Determination does not meet that standard. It reaches conclusions that are not reconciled with the evidence before the Ombudsman, leaves material legal questions unanswered, and provides no explanation for disregarding Pronto's continuing affirmative response to LTD's Charter Notice while unlawfully granting LTD permission to reclaim the service under

§604.9, which is not at all applicable given the preponderance of irrefutable evidence, facts, and records presented by Pronto.

These are not procedural or technical deficiencies. They go directly to the integrity of the Charter Notice process and the protections Congress enacted for registered private charter providers under 49 U.S.C. §5323(d) and 49 CFR Part 604.

Accordingly, Pronto respectfully requests that the Office of Chief Counsel reconsider, vacate, and clarify the April 28, 2026, Administrative Determination and issue a revised determination based upon the complete administrative record.

Should the April 28 Determination ultimately become the subject of judicial review, the adequacy of its legal reasoning, its treatment of the administrative record, and its interpretation of Part 604 will necessarily be subject to independent review by the courts. Pronto respectfully submits that it is in the interest of all parties—and of the Federal Transit Administration itself—that those issues be fully addressed administratively before judicial review becomes necessary.

APPENDIX A: Material Issues Presented in Pronto's April 12 Response Not Addressed in the April 28 Determination.

Issue Raised by Pronto	Where Raised (April 12 Response)	Addressed in April 28 Determination?
Continuing affirmative response	Section II	No
Ready, willing and able	Section III	No
MTR Western operating plan	Section IV	No
Demand-responsive operating plan	Section IV	No
Two operational alternatives	Section IV	No
LTD's conduct during Charter Notice process	Section V	No
Applicability of §604.9 given active respondent	Section VI	No

APPENDIX C: CHRONOLOGICAL DISCOVERY & FILING INDEX

- **Exhibit C.1:** Response by Pronto to Request for Advisory Opinion submitted by LTD (Dated April 12, 2026)
- **Exhibit C.2:** Formal Part 604 Complaint and Interference Memorandum against Lane Transit District filed with the FTA Charter Ombudsman (Dated April 13, 2026)
- **Exhibit C.3:** Administrative Determination and Advisory Opinion Email issued by FTA Charter Ombudsman Kathy Breeden (Dated April 28, 2026).
- **Exhibit C.4:** Ombudsman – Pronto E-mail (Dated June 9, 2026)
- **Exhibit C.5:** Notice of Charter Service Complaint against Lane Transit District (Dated June 29, 2026)



**BEFORE THE FEDERAL TRANSIT ADMINISTRATION
OFFICE OF CHIEF COUNSEL
OMBUDSMAN for CHARTER SERVICES**

**RESPONSE OF PRONTO CORPORATION
TO REQUEST FOR ADVISORY OPINION SUBMITTED BY LANE TRANSIT DISTRICT
REGARDING APPLICATION OF 49 C.F.R. PART 604
(OREGON COUNTRY FAIR SHUTTLE SERVICE)**

Submitted by:
Pronto Journeys
FTA Charter Registration ID: 6643
April 12, 2026

I. INTRODUCTION

Accelar, Inc. dba Pronto Corporation and Pronto Journeys (www.ProntoJourneys.com) ("Pronto"), a registered charter provider under the Federal Transit Administration ("FTA") Charter Service Rule, submits this response to the Request for Advisory Opinion ("RFAO") filed by Lane Transit District ("LTD") on April 7, 2026.

LTD's submission presents a materially incomplete, and in several respects incorrect, characterization of both the factual record and the governing regulatory framework. Specifically, LTD has:

1. Represented Pronto as lacking capacity to perform the requested charter service;
2. Asserted an overly broad interpretation of discretionary authority under 49 C.F.R. §604.8; and
3. Positioned itself to provide the very charter service at issue under 49 C.F.R. §604.9, while interfering with Pronto's ability to operate the service.

This response provides a complete factual chronology, supported by documentary evidence, and demonstrates that LTD's position is inconsistent with both the letter and intent of 49 C.F.R. Part 604 and its statutory foundation in 49 U.S.C. §5323(d).

II. STATEMENT OF FACTS

A. Issuance of Charter Notice and Pronto's Response

LTD issued a charter notice for the Oregon Country Fair ("OCF") 2026 shuttle service. (**EXHIBIT A.1 – Charter Notice**). We, a duly registered charter provider, responded affirmatively and in a timely manner,

thereby establishing our status as a responding provider under the Charter Service Rule.
(EXHIBIT A.2, A.3, A.4).

B. Engagement with OCF

Following our response to LDT, we engaged directly with OCF's Executive Director Kirsten Bolton via email (Exhibit B.1) and communicated to her Pronto's acceptance of the Charter Notice. We then scheduled a call with her on 01-08-2026 to gather additional details of OCF's requirements. The call was attended by Kirsten Bolton ("KB") from OCF and Pronto personnel – Kumar Shah, and Pronto Operations Team.

During the call, KB shared with us the following:

- a) LDT had been operating the shuttle services for OCF for 20+ years and she was uncomfortable switching to a different / private operator;
- b) Using private buses and motor coaches for the OCF shuttle service would cost a lot more and that OCF could not afford to pay even a dollar more for the shuttle service and if Pronto's proposed rate came in even a dollar more than LDT's rate she would reject it;
- c) The low-hanging branches of the trees lining the access road on the OCF property would cause damage to buses and motorcoaches since they have a higher profile than transit buses;
- d) Several other operators had indicated they would be ready, willing, and able to provide the shuttle services for OCF in prior years, but they backed down because of some of these challenges.

Pronto indicated during the call that at this time we were doing our due diligence to figure out what it would take for us to operate the service and that the next step was for us to gather data from LTD for the shuttle services they operated in the prior three years.

After the call, we emailed her a summary of our plan to meet OCF's shuttle service requirements [Exhibit B.3]. Kirsten Bolton (KB) responded on 01-09-2026 *"Thank you, Kumar. I look forward to hearing from you in the next few weeks."* (Exhibit B.4).

C. Due Diligence, Analysis & Proposed Options

We then proceeded with our plan:

- a) Review and analysis of historical data of the shuttle services for the prior 3 years

We sent requests to LDT – under the Public Records Act (Sunshine Law in Oregon) – for all the records related to their operation of the Shuttle Services for 2023, 2024 and 2025. LDT

responded to the requests immediately and provided all the data and documents responsive to our requests.

Upon receipt of the information and the data, we built an extensive demand model for the shuttle services based on boardings per hour throughout the day for all three (3) days of the event for the years 2023, 2024, and 2025. Based on KB's guidance, we built the demand model for 2026 based on the data for 2025.

Our analysis revealed that the demand varied significantly from day to day – with Day 2 showing the highest number of boardings – and from hour to hour throughout the day.

LTD operated the shuttle service with 20 buses in 2025 on all three (3) days. Even on Day 2, which had the highest number of boardings, the buses completed an average of more than 2 and less than 3 loops for the entire day.

b) Equipment availability from private charter operators in / around Veneta / Eugene, Oregon

As we have done for large scale events for the past 15+ years - San Francisco 49ers home games, Paul McCartney concert, JayZ and Justin Timberlake concert, University of California Berkeley football games - our operations team reached out to our affiliates in / around Veneta and Eugene, Oregon. We identified two affiliates who had more than 30 motor coaches available for the OCF shuttle services.

c) Site Visit and Dry Run of the Route

Four representatives of Our Eugene, Oregon based affiliate, MTR Western, visited the OCF site and did a dry run. Video recording of the route was shared with us by the affiliate.

After reviewing the video recording and based on a detailed report of the site visit by our affiliate, we identified the low hanging branches of the trees needing trimming and clearance of the brush lining the access roads. We then shared the recording with a local company – Purple Heart Tree Service – to get an estimate for the requisite tree trimming and other pruning / clearance to make the access roads accessible for motorcoaches.

d) Demand model for 2026 OCF

Based on this review of historical data and based on our detailed hourly demand model for each of the three days of the event, we came up with our projections of buses required:

- Friday (July 10, 2026) – 6 articulated buses
- Saturday (July 11, 2026) – 7 articulated buses
- Sunday (July 12, 2026) – 6 articulated buses

e) Shuttle service options / proposal for OCF

Once we received the estimate we factored into our plan and on 03-03-2026, we presented a proposal to KB / OCF with two options:

Option 1 – Dedicated Motorcoach Shuttle Program

- Dedicated fleet sized to meet peak 2025 hourly demand
- Comfortable seated capacity for all riders
- Fixed Contract Price: **\$110,000**
- In exchange for a three-year agreement, Pronto would absorb the one-time \$8,000 clearance cost
- 3% annual adjustment

This structure provides a fully dedicated fleet and operational certainty over a multi-year horizon.

Option 2 – LTD Vehicles & Operators (Leasing Structure)

As a registered charter provider, Pronto is responsible for ensuring any solution aligns with the FTA Charter Rule framework. We are engaged in discussions with Lane Transit District regarding a compliant vehicle and operator leasing structure.

Under this model:

- LTD vehicles and operators would be utilized
- Pronto would administer and manage the charter service
- Fixed Contract Price: **\$110,000**
- 3% annual adjustment

This pricing remains more than 10% below what OCF paid in 2025 and reflects a demand-driven provisioning model based on actual hourly ridership data.

We received a response from KB on 03-03-2026 (Exhibit B.5):

Hello Kumar,

Thank you for reaching out. Option 1 is a no go. As I have said numerous times, we will not trim our trees. Option 2 is doable, if LTD is willing to lease Pronto their vehicles. LTD

is a local entity that has the ability to service our event because their vehicles can handle our site, no tree trimming required. I have cc'd LTD on this email to get confirmation that this is even an option for them.

As for a three-year contract, we would want to see if you can provide the service efficiently the first year before signing a three-year contract.

*Have a nice day,
Kirsten Bolton*

C. LTD's Request to operate the OCF Shuttle Service should be denied

We have provided significant and compelling evidence and documentation of our extensive engagement with the client over the past several months:

- a) Reviewed and analyzed the OCF shuttle service requirements
- b) Conducted a detailed analysis of the historical data for the OCF shuttle service for the past 3 years – 2023, 2024, and 2025:
 - a. This data was provided to Pronto by LTD in response to our CPRA requests (Exhibits 1.6, 1.7, A.8, A.8.1, A.9, 1.10)
 - b. We presented to OCF two options based on this analysis showing how the OCF shuttle services could be operated more efficiently by making it more demand-responsive and configured to meet the detailed demand model we developed for each of the three days of the OCF event.
 - c. We presented to OCF a proposal to operate the shuttle service using a) private motorcoaches, or b) transit buses.
 - d. Per our model, we can deliver the services using either option for a price that is more than 10% below what OCF paid LTD in 2025
- c) We have outlined for OCF several other options to broaden their services with Intercity services and with multiple routes to serve other cities in OCF's vicinity

LTD has established no basis for its statement that 'A charter provider that fails to contact or pursue services with the Customer may be treated as non-responsive under 604.9'. While not naming Pronto as the 'charter provider' in this statement, it is clear that LTD has directed this comment at Pronto. For LTD to make such a statement and assertion about Pronto and to use it as the justification for LTD to provide the requested service directly is a violation of the FTA Charter Rule.

D. Invocation of §604.8 Leasing Provision

On 03-03-2026, we presented to OCF two options: 1) Private Motorcoaches and 2) Transit Buses. OCF rejected option a) (Exhibit B.5) and indicated:

Option 2 is doable, if LTD is willing to lease Pronto their vehicles.

OCF / KB reiterated the same message in her email dated 03-16-2026 (Exhibit B.6):

We just want shuttle service.

Hence, we formally invoked the leasing provision under 49 C.F.R. §604.8 and submitted a request to LTD for:

- Articulated buses
- Operators; and
- Supervisory staff.

(Exhibits A.13.1, A.13.2, A.13.3)

E. LTD's Denial Without Substantive Explanation

On March 3, 2026, LTD declined Pronto's leasing request – Exhibit A.14 - stating only that the request did not meet the requirements of §604.8.

LTD did not identify:

- Which specific requirement(s) of §604.8 were not satisfied; or
- Any factual basis for its determination.

LTD's own Charter Service Policy (Exhibit A.17) cites its policy for Leasing of Equipment and Driver that LTD is allowed to lease its FTA-funded equipment and drivers to registered charter providers for charter services only if the following conditions exist:

- a. The private charter operator is registered on the FTA charter registration Web site
- b. The registered charter provider owns and operates buses or vans in a charter service business
- c. The registered charter provider received a request for charter service that exceeds its available capacity either of the number of vehicles operated or the number of accessible vehicles operated by the registered charter provider and
- d. The registered charter provider has exhausted all of the available vehicles of all registered charter providers in LTD's geographic service area.

Pronto has met each and every condition set forth in 49 C.F.R. §604.8(a), as well as the corresponding criteria articulated in LTD's own Charter Service Policy (Exhibit A.17). LTD has identified no specific deficiency in Pronto's leasing request under any of these elements.

F. Follow-Up Requests and Lack of Response

Pronto submitted follow-up communications on March 5 and March 10 requesting clarification of LTD's position (**Exhibits A.13.2, A.13.3**). LTD did not provide any substantive response.

G. LTD's denial of leasing of equipment and drivers to Pronto is discriminatory and self-serving

LTD has been operating the OCF shuttle services for the past 20+ years. For the 2026 OCF event, Pronto has responded affirmatively to LTD's charter notice. We have established conclusively that we are ready, willing, and able to provide the service. Since OCF / KB has rejected the option to use motor coaches, the delivery of the service requires transit buses to meet the client's needs. LTD has met the need for 20+ years and has indicated its willingness to do so for the 2026 OCF event as well, but only to OCF directly, while declining Pronto's leasing request. By doing so, LTD is a) exhibiting discriminatory practice and behavior, and b) denying Pronto's rights to open, fair and equal access to the federal funded equipment while extending that access to OCF.

We have presented evidence that LTD's behavior and conduct are self-serving and designed to promote LTD as the provider of OCF Shuttle Services by blocking Pronto from operating the services. LTD issued the Charter Notice in December 2025 – as it has done in years past – for these services. It is now denying access to the federally funded equipment to Pronto and while doing so stating that Pronto does not have the capacity to meet the requirements for the service.

LTD is the steward for the equipment it operates, and it does so on behalf of the public. Its denial of Pronto's request to lease the equipment, LTD is acting as the 'owner' of the equipment and not its steward. No government agency or entity has conferred upon LTD the right to a) 'own' the equipment and b) deny Pronto's request to lease equipment selectively, arbitrarily, and discriminatorily and in a manner that is self-serving.

LTD's selective denial of access to federally funded equipment—while maintaining its willingness to deploy those same assets for the same service—raises serious concerns regarding unequal and discriminatory treatment.

Federally funded assets are held in trust for public purposes and must be administered in a manner consistent with federal law. A recipient may not selectively withhold access to such assets in a manner

that disadvantages a registered charter provider while preserving the recipient's own ability to perform the service.

III. ARGUMENT

A. LTD Does Not Meet the Requirements of §604.9

Section 604.9 permits a recipient to provide charter service only under narrowly defined conditions, including where no registered provider is "willing and able."

Here, the record establishes that Pronto:

- Responded affirmatively to the charter notice;
- Engaged extensively with the client;
- Developed and presented operational plans; and
- Remains ready, willing, and able to perform.

LTD's attempt to invoke §604.9 is not merely unsupported - it is precluded by the record. The regulatory standard is not whether a recipient believes a provider is optimal or preferable, but whether a registered charter provider is "willing and able." Pronto has demonstrated both through documented engagement, operational planning, and formal invocation of §604.8.

A recipient may not manufacture ineligibility under §604.9 by (i) denying access to necessary federally funded assets, and then (ii) asserting that the resulting constraint renders the provider incapable.

B. LTD's Interpretation of §604.8 Is Structurally and Legally Deficient

LTD asserts that §604.8 is discretionary because it uses the term "may."

While leasing is not mandatory in every instance, such discretion must be exercised such that it is consistent with:

- The statutory prohibition on recipient-provided charter service; and
- The overarching purpose of Part 604.

LTD's interpretation would permit a recipient to:

1. Decline leasing request by private operators;
2. Declare private providers incapable; and
3. Provide the service directly.

This interpretation nullifies the Charter Service Rule.

Finally, LTD's Request for Advisory Opinion should be viewed in context. The issues presented are not abstract questions of regulatory interpretation. They arise from a concrete set of actions taken by LTD in connection with a specific charter service request.

Accordingly, any interpretation adopted by FTA should be grounded in the factual record and should not enable a recipient to deny leasing, impede a qualified provider, and subsequently position itself to provide the same service.

C. LTD's Redefinition of "Capacity" Is Unsupported

LTD asserts that Pronto lacks capacity because it sought to utilize leased equipment.

This argument is inconsistent with §604.8, which expressly contemplates:

- Situations where demand exceeds a provider's fleet;
- Situations where federally funded equipment operated by the recipient is the only viable option to meet the client's / public needs; and
- The use of leasing to bridge that gap.

Pronto's actions fall squarely within the regulatory framework.

D. LTD's Conduct Constitutes Interference with the Charter Process

The record demonstrates a pattern of conduct by LTD that interfered with the Charter Rule process, including:

- Influencing client behavior and creating friction between the client and Pronto;
- Encouraging withdrawal by the charter provider; and
- Withholding leasing while preserving its own ability to provide service

Such conduct is inconsistent with the neutrality required of a recipient.

The Charter Service Rule presumes a neutral role for recipients in administering the notice and response process. LTD's conduct—both through written communications to the customer and verbal communications to Pronto—departed from that neutral role and instead influenced the outcome of the procurement process.

Such conduct is inconsistent with the structure and purpose of Part 604, which is designed to ensure that private charter providers are afforded a fair and meaningful opportunity to perform requested services.

E. Pronto Has Demonstrated the Requisite Ability, Willingness and Readiness

Pronto conducted a detailed analysis of three years of LTD-provided data, including:

- Hourly ridership;
- Demand peaks;
- Cycle times; and
- Vehicle utilization.

Based on this analysis, Pronto developed a demand-responsive plan requiring:

- Friday: 6 articulated buses
- Saturday: 7 articulated buses
- Sunday: 6 articulated buses

This plan:

- Meets demand with a 10% buffer;
- Improves utilization of the equipment significantly; and
- Reduces cost by more than 10%.

This analysis is backed by 20+ years of our experience in providing charter services and 15+ years of providing large scale shuttle services – like San Francisco 49ers home games since 2010, large scale concerts, and other public events. We have an exemplary record of providing Safe. Dependable.

Comfortable. service:

- 60,000+ trips
- 2.5M+ passengers
- 100% injury-free

We – Pronto – are ready, willing, and able to operate the OCF shuttle service.

IV. CONCLUSION

This matter presents a clear application of the Charter Service Rule:

- A registered provider responded and is ready, willing, and able;

- The recipient has been providing its equipment, drivers, and supervisory staff for OCF for 20+ years – the same event for which Pronto has requested LTD to lease its equipment, drivers, and supervisory staff;
- The recipient denied leasing without justification and even though we have met all the stated conditions listed in LTD's own Charter Policy;
- While denying Pronto its rights to lease the equipment, the recipient is simultaneously and concomitantly seeking to provide the service directly, which represents a conflict of interest

FTA should make the following determinations:

- That §604.9 is inapplicable where a registered charter provider has responded and demonstrated willingness and capability
- That §604.8 may not be applied in a manner that prevents a qualified provider from performing service while enabling a recipient to do so
- That LTD's denial of Pronto's leasing request was unsupported by the requirements of §604.8
- That LTD's actions interfered with the proper operation of the Charter Service Rule

Accordingly, Pronto respectfully requests that FTA:

1. Deny LTD's request to provide the charter service directly;
2. Direct LTD to comply with the Charter Service Rule in its administration of this matter;
3. Confirm Pronto's rights to open, fair and equal access to the federally funded LTD equipment and the rights to lease the equipment, drivers, and supervisory staff to operate the OCF shuttle services;
4. Overturn LTD's denial of leasing request initiated by Pronto; and
5. Take such further action as FTA deems appropriate to ensure compliance.

Respectfully submitted,

Kumar Shah

President

Pronto Journeys

FTA Charter Registration ID: 6643

Pronto Corporation

Pronto Group Transportation Network (GTN) - The Network Model for Group Transportation

84 W Santa Clara St, Suite 700, San Jose, CA

650.249.7400 | www.ProntoJourneys.com | www.ProntoExperiences.com

kumar accelar.com

From: Bret Smith <Bret.Smith@ltd.org>
Sent: Wednesday, December 24, 2025 10:40 AM
To: Bret Smith
Subject: 2026 Oregon Country Fair charter posting
Attachments: 2026 Oregon Country Fair Charter posting.pdf

In compliance with FTA rules 49 CFR Ch. VI 604.14 Lane Transit District is providing notice to registered private charter providers on behalf of the Oregon Country Fair (OCF). Lane Transit District is reaching out to registered private charter providers to determine interest to provide charter shuttle service between the park and ride and the event venue.

Lane Transit District has interest in providing this service if there are no registered charter providers who show interest to provide this service.

Thank you,

Bret Smith

Lane Transit District
Senior Service Planner
P:541-682-6191 | F: 541- 682-6111
Contact us at ltd.org



December 24th , 2025

In compliance with FTA rules 49 CFR Ch. VI 604.14 Lane Transit District is providing notice to registered private charter providers on behalf of the Oregon Country Fair (OCF). Lane Transit District is reaching out to registered private charter providers to determine interest to provide charter shuttle service between the park and ride and the event venue. Lane Transit District has interest in providing this service. Lane Transit District will be charging \$296 per service hour if the service is provided by Lane Transit District.

If you are willing and able to provide all service as listed below, please respond to Lane Transit District within 14 days of the listed date of this notice.

Event Name: 2026 Oregon Country Fair

<https://www.oregoncountryfair.org/>

Event Organizer Contact Information:

Kristen Bolton, Oregon Country Fair
 442 Lawrence Street, Eugene OR 97401
 Telephone: 541-935-7240
 Email: kbolton@oregoncountryfair.org

Agency Contact Information:

Bret Smith, Lane Transit District
 3500 East 17th Avenue, Eugene, Oregon
 Telephone: 541-682-6191
 Email: bret.smith@ltd.org

Service Dates:

July 10 - 12, 2026

Service hours:

Service would operate:

July 10 – 12, 2026, 10:00 am to 9:00 pm

Buses begin service from Downtown Eugene and Valley River Center at 10 a.m.; last departure from the Oregon Country Fair venue (44.055956, -123.373567) leaves at 9:00 p.m.

Service Details:

The Oregon Country Fair (OCF) desires an efficient and affordable transit service for fairgoers to travel by bus to and from the Oregon Country Fair during the event July 10, 11, and 12, 2026. Transit service to the OCF supports the City of Eugene's and Lane County's Climate action plans by reducing problems caused by traffic congestion, vehicle pollution, parking issues, and noise, as well as ensures equity of access to the event for all.



P.O. Box 7070, Springfield, OR 97475-0470 | 3500 E. 17th Ave., Eugene, OR 97403

P 541-687-5555 | **F** 541-682-6111 | 7-1-1 TTY | LTD.org



The Oregon Country Fair is held in a wooded space that once a year transforms to a wooded fair site; access to/from the site travels through fields and graveled dirt roads; the route includes low-hanging branches and a tight turnaround.

Ridership:

In 2025, shuttles transported 12,230 passengers over the three-day event. Based on previous years it is estimated it will require a minimum of 20 full size buses with ADA capabilities along with ground crew to load and unload buses at each location to maintain 15-minute frequency between the park and rides and the park venue. In 2025 the 20 buses accumulated 464 service hours over the 3-day event.



This diagram shows the travel into the fair-site shuttle drop-off location. The return shuttle picks up at the same location, and exits via Aero Road. The roads shown here are gravel roads.

If you have questions, please respond to Bret Smith by email at bret.smith@ltd.org.



kumar accelar.com

From: kumar accelar.com
Sent: Friday, December 26, 2025 8:12 AM
To: 'Bret Smith'
Cc: Customer Service
Subject: RE: 2026 Oregon Country Fair charter posting

Greetings Bret & Happy Holidays,

Thank you for sharing with us this charter posting. We are a registered with the FTA as a Charter Bus provider to offer services nationwide. We are ready and able to cover the services for the 2026 Oregon County Fair. Kindly put us in contact with the appropriate authorities who have requested these services so we can work out the logistics with them.

Best regards,
Kumar

Kumar Shah
President & CEO
Accelar, Inc.
84 W Santa Clara St
Suite 700
San Jose, CA 95113
kumar@accelar.com
650.249.7418 (w)
408.472.5662 (mobile)

From: Bret Smith <Bret.Smith@ltd.org>
Sent: Wednesday, December 24, 2025 10:40 AM
To: Bret Smith <Bret.Smith@ltd.org>
Subject: 2026 Oregon Country Fair charter posting

In compliance with FTA rules 49 CFR Ch. VI 604.14 Lane Transit District is providing notice to registered private charter providers on behalf of the Oregon Country Fair (OCF). Lane Transit District is reaching out to registered private charter providers to determine interest to provide charter shuttle service between the park and ride and the event venue.

Lane Transit District has interest in providing this service if there are no registered charter providers who show interest to provide this service.

Thank you,

Bret Smith
Lane Transit District
Senior Service Planner
P:541-682-6191 | F: 541- 682-6111
Contact us at ltd.org

kumar accelar.com

From: kumar accelar.com
Sent: Friday, December 26, 2025 8:30 AM
To: Bret Smith
Cc: Customer Service
Subject: Confirmation of Pronto Availability – 2026 Oregon Country Fair Charter Service (49 CFR Part 604.14)

Importance: High

Dear Bret,

Thank you for Lane Transit District's charter service notice dated December 24, 2025, issued pursuant to **49 CFR Part 604.14**, regarding shuttle service for the **2026 Oregon Country Fair**.

This letter serves as Pronto Journeys' **formal confirmation for the record** that we are a **registered private charter provider** and are **willing and able to provide the full scope of charter shuttle services** described in your notice, including but not limited to:

- Service dates: **July 10–12, 2026**
- Operating hours: **10:00 a.m. – 9:00 p.m.**
- Deployment of a minimum of **20 full-size, ADA-accessible buses**
- Required service frequency between park-and-ride locations and the fair venue
- Operation on gravel roads and constrained fair-site access routes
- Provision of appropriate on-site ground operations support

As stated in LTD's notice, Lane Transit District would only provide this charter service **in the absence of any willing and able registered private charter provider**. Given Pronto's affirmative response and demonstrated capability, **the conditions under which LTD could lawfully provide this charter service are not met**.

Accordingly, and consistent with the **FTA Charter Service Rule**, we understand that Lane Transit District will **step aside from directly providing this charter service**, allowing the service to be provided by a registered private charter operator.

For clarity and completeness, Pronto's operational plan contemplates that **if aggregate private charter capacity were to be fully exhausted**, Pronto may **reach out to Lane Transit District to explore leasing buses and/or drivers strictly as supplemental capacity**, under Pronto's operational control, and **not as charter service operated by LTD**. Any such leasing arrangement would be structured to remain fully compliant with **49 CFR Part 604**.

Please advise if LTD requires any additional documentation from Pronto to confirm availability or qualifications, or if there are administrative next steps to formally close out LTD's charter notice for this event.

We appreciate LTD's adherence to federal charter service requirements and look forward to working collaboratively to support the Oregon Country Fair with safe, reliable, and compliant transportation services.

Sincerely,
Kumar Shah
Pronto Journeys
Accelar, Inc.

Kumar Shah
President & CEO
Accelar, Inc.
84 W Santa Clara St
Suite 700
San Jose, CA 95113
kumar@accelar.com
650.249.7418 (w)
408.472.5662 (mobile)

From: Bret Smith <Bret.Smith@ltd.org>
Sent: Wednesday, December 24, 2025 10:40 AM
To: Bret Smith <Bret.Smith@ltd.org>
Subject: 2026 Oregon Country Fair charter posting

In compliance with FTA rules 49 CFR Ch. VI 604.14 Lane Transit District is providing notice to registered private charter providers on behalf of the Oregon Country Fair (OCF). Lane Transit District is reaching out to registered private charter providers to determine interest to provide charter shuttle service between the park and ride and the event venue.

Lane Transit District has interest in providing this service if there are no registered charter providers who show interest to provide this service.

Thank you,

Bret Smith

Lane Transit District
Senior Service Planner
P:541-682-6191 | F: 541- 682-6111
Contact us at ltd.org



kumar accelar.com

From: Bret Smith <Bret.Smith@ltd.org>
Sent: Monday, December 29, 2025 1:32 PM
To: kumar accelar.com
Cc: Customer Service; kbolton@oregoncountryfair.org
Subject: RE: [External Sender]Confirmation of Pronto Availability – Charter Service (49 CFR Part 604.14)

Dear Kumar,

Thank you for your detailed response to Lane Transit District's charter service notice dated December 24, 2025, regarding shuttle service for the 2026 Oregon Country Fair. We acknowledge Pronto Journeys' confirmation that it is a registered private charter transportation provider and that it is willing and able to provide the full scope of services described in the notice.

Consistent with 49 CFR Part 604 and based on your affirmative response, Lane Transit District understands that it would not directly provide charter service for this event, as a willing and able registered private charter provider has come forward.

For coordination purposes, the primary contact for the Oregon Country Fair is:

Kirsten Bolton
Oregon Country Fair
Email: kbolton@oregoncountryfair.org
Phone: 541-343-4298

Please note that Lane Transit District requests to be notified as soon as possible if Accelar, Inc. dba Pronto Journeys withdraws its interest or is unable to provide the charter service described. Timely notice is essential to allow for compliance with federal requirements and to ensure adequate transportation planning for the event.

If additional information or documentation is required please reach out to Kirsten Bolton from Oregon Country fair.

Sincerely,

Bret Smith
Lane Transit District
Senior Service Planner
P:541-682-6191 | F: 541- 682-6111
Contact us at ltd.org



From: kumar accelar.com
Sent: Friday, December 26, 2025 8:47 AM
To: Bret Smith

Cc: Customer Service

Subject: [External Sender]Confirmation of Pronto Availability – Charter Service (49 CFR Part 604.14)

You don't often get email from kumar@accelar.com. [Learn why this is important](#)

Dear Bret,

Thank you for Lane Transit District's charter service notice dated December 24, 2025, issued pursuant to **49 CFR Part 604.14**, regarding shuttle service for the **2026 Oregon Country Fair**.

This letter serves as Pronto Journeys' **formal confirmation for the record** that we are a **registered private charter transportation provider (FTA Charter Registration ID: 6643)** and are **willing and able to provide the full scope of charter shuttle services** described in your notice, including but not limited to:

- Service dates: **July 10–12, 2026**
- Operating hours: **10:00 a.m. – 9:00 p.m.**
- Deployment of a minimum of **20 full-size, ADA-accessible buses**
- Required service frequency between park-and-ride locations and the event venue
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- Provision of appropriate on-site ground operations support

As stated in LTD's notice, Lane Transit District would only provide this charter service **in the absence of any willing and able registered private charter provider**. Given Pronto's affirmative response and demonstrated capability, **the conditions under which LTD could lawfully provide this charter service are not met**.

Accordingly, and consistent with the **FTA Charter Service Rule**, we understand that Lane Transit District will **step aside from directly providing this charter service**, allowing the service to be provided by a registered private charter operator.

Capacity Contingency (Leasing Only)

For clarity and completeness, Pronto's operational plan contemplates that **if aggregate private charter capacity were to be fully exhausted**, Pronto may **reach out to Lane Transit District to lease buses and/or drivers strictly as supplemental capacity**, under **Pronto's operational direction and control**, and **not as charter service operated by LTD**. Any such leasing arrangement would be structured to remain fully compliant with **49 CFR Part 604**, with Pronto remaining the charter service provider of record.

Please advise if LTD requires any additional documentation from Pronto to confirm availability or qualifications, or if there are administrative next steps to formally close out LTD's charter notice for this event.

We appreciate LTD's adherence to federal charter service requirements and look forward to working collaboratively to support the Oregon Country Fair with safe, reliable, and compliant transportation services.

Sincerely,
Kumar Shah

Kumar Shah
President & CEO
Accelar, Inc. dba Pronto Journeys
84 W Santa Clara St
Suite 700
San Jose, CA 95113
kumar@accelar.com

650.249.7418 (w)
408.472.5662 (mobile)

From: Bret Smith <Bret.Smith@ltd.org>
Sent: Wednesday, December 24, 2025 10:40 AM
To: Bret Smith <Bret.Smith@ltd.org>
Subject: 2026 Oregon Country Fair charter posting

In compliance with FTA rules 49 CFR Ch. VI 604.14 Lane Transit District is providing notice to registered private charter providers on behalf of the Oregon Country Fair (OCF). Lane Transit District is reaching out to registered private charter providers to determine interest to provide charter shuttle service between the park and ride and the event venue.

Lane Transit District has interest in providing this service if there are no registered charter providers who show interest to provide this service.

Thank you,

Bret Smith
Lane Transit District
Senior Service Planner
P:541-682-6191 | F: 541- 682-6111
Contact us at ltd.org



Kumar Shah

From: Pronto Journeys
Sent: Tuesday, January 6, 2026 4:34 PM
To: bret.smith@ltd.org
Cc: Kumar Shah
Subject: RE: 2026 Oregon Country Fair charter posting

Greetings,

I hope you're doing well.

We are reaching out to request your assistance with providing **transit buses** and **on-site supervisory support** for an upcoming operation for the **OCF**. Given the scope of the service requirements, your support would be greatly appreciated in helping us ensure smooth and reliable execution.

We would welcome the opportunity to discuss this further and review the operational needs together. Please let us know a **convenient time** for a **conference call** so we can align on availability, expectations, and next steps.

Thank you in advance for your support and collaboration. We look forward to working closely with you.

Best Regards,

Art

Dispatcher



[Scan me to watch me in action](#)

A promotional banner for Pronto Journeys. The background is yellow. On the left, it says "Pronto Journeys" in large black letters, with the tagline "Safe. Dependable. Comfortable." below it. To the right of the text is a small dog logo. Below the text, it lists "Group Transportation since 2005", "60K+ Trips. 2.4M+ Passengers.", and "100% Injury-free". It also features a "RATING 4.93 / 5.0" with five stars. On the right side, under "Customer Service", it provides a phone number "+1-650-249-7415", an email "CS@ProntoJourneys.com", and an address "84 W Santa Clara St, Ste 700 San Jose, CA 95113". At the bottom, there are five icons of different types of vehicles: a large bus, a smaller bus, a van, a truck, and a minivan.

From: kumar accelar.com <kumar@accelar.com>
Sent: Wednesday, December 24, 2025 10:55 AM
To: Customer Service <CS@accelar.com>
Subject: Fwd: 2026 Oregon Country Fair charter posting

----- Forwarded message -----

From: Bret Smith
Date: Dec 24, 2025 12:40
Subject: 2026 Oregon Country Fair charter posting
To: Bret Smith
Cc:

In compliance with FTA rules 49 CFR Ch. VI 604.14 Lane Transit District is providing notice to registered private charter providers on behalf of the Oregon Country Fair (OCF). Lane Transit District is reaching out to registered private charter providers to determine interest to provide charter shuttle service between the park and ride and the event venue.

Lane Transit District has interest in providing this service if there are no registered charter providers who show interest to provide this service.

Thank you,

Bret Smith

Lane Transit District

Senior Service Planner

P:541-682-6191 | F: 541- 682-6111

Contact us at ltd.org



Pronto Journeys

From: Bret Smith <Bret.Smith@ltd.org>
Sent: Wednesday, January 7, 2026 2:08 PM
To: Pronto Journeys
Cc: Kumar Shah
Subject: RE: [External Sender]RE: 2026 Oregon Country Fair charter posting and X Games

Hello,

Thank you for reaching out and for considering LTD as a potential partner for this operation. We appreciate the overview of your needs and the opportunity to discuss your service requirements.

After review, LTD must decline this request. In accordance with Federal Transit Administration regulations, specifically 49 CFR § 604.8, federally funded transit agencies are restricted from leasing buses or providing operators to private charter providers except under very limited circumstances. At this time, LTD does not have an interest in, nor the ability to, lease its buses or provide operators or supervisory staff for private charter services.

We appreciate you thinking of LTD and wish you success in securing the resources needed for a smooth and reliable operation.

Best regards,

Bret Smith
Planning & Development | Senior Service Planner
P:541-682-6191



From: Pronto Journeys
Sent: Tuesday, January 6, 2026 4:34 PM
To: Bret Smith
Cc: Kumar Shah
Subject: [External Sender]RE: 2026 Oregon Country Fair charter posting

You don't often get email from cs@prontojourneys.com. [Learn why this is important](#)

Greetings,

I hope you're doing well.

We are reaching out to request your assistance with providing **transit buses** and **on-site supervisory support** for an upcoming operation for the **OCF**. Given the scope of the service requirements, your support would be greatly appreciated in helping us ensure smooth and reliable execution.

We would welcome the opportunity to discuss this further and review the operational needs together. Please let us know a **convenient time** for a **conference call** so we can align on availability, expectations, and next steps.

Thank you in advance for your support and collaboration. We look forward to working closely with you.

Best Regards,
Art
Dispatcher



Scan me to watch me in action



From: kumar accelar.com <kumar@accelar.com>
Sent: Wednesday, December 24, 2025 10:55 AM
To: Customer Service <CS@accelar.com>
Subject: Fwd: 2026 Oregon Country Fair charter posting

----- Forwarded message -----

From: Bret Smith
Date: Dec 24, 2025 12:40
Subject: 2026 Oregon Country Fair charter posting
To: Bret Smith
Cc:

In compliance with FTA rules 49 CFR Ch. VI 604.14 Lane Transit District is providing notice to registered private charter providers on behalf of the Oregon Country Fair (OCF). Lane Transit District is reaching out to registered private charter providers to determine interest to provide charter shuttle service between the park and ride and the event venue.

Lane Transit District has interest in providing this service if there are no registered charter providers who show interest to provide this service.

Thank you,

Bret Smith

Lane Transit District

Senior Service Planner

P:541-682-6191 | F: 541- 682-6111

Contact us at ltd.org



Kumar Shah

From: Kumar Shah
Sent: Thursday, January 8, 2026 5:48 AM
To: Bret Smith
Cc: Kumar Shah
Subject: Request for Records – Past Oregon Country Fair Shuttle Services

Dear Bret,

Separately, and for planning and compliance purposes, we respectfully request copies of records relating to **Lane Transit District's past provision of shuttle or special-event transportation services for the Oregon Country Fair.**

Specifically, we request records for the most recent years in which LTD provided service, including but not limited to:

- Service dates and hours of operation
- Number and type of vehicles deployed (including ADA-accessible vehicles)
- Total service hours provided
- Ridership counts
- Staffing levels (drivers, supervisors, on-site personnel)
- Cost or internal charge rates associated with the service
- Any agreements, MOUs, or correspondence between LTD and the Oregon Country Fair
- Any documentation addressing Charter Rule compliance for those services

This request is made to better understand historical operating parameters and to ensure continuity and compliance as the Oregon Country Fair transitions to private charter service provision consistent with **49 CFR Part 604.**

Please let us know if these records are readily available or if you prefer that we submit this request through a formal public records process.

Thank you for your assistance.

Best regards,

Kumar Shah

President & CEO

Accelar, Inc. dba Pronto Journeys

FTA Charter Registration ID: **6643**

kumar accelar.com

From: kumar accelar.com
Sent: Wednesday, January 21, 2026 8:23 AM
To: 'Bret Smith'
Subject: RE: [External Sender]Confirmation of Pronto Availability – Charter Service (49 CFR Part 604.14)

Hi Bret,

We are in contact with Carrie / your CPRA request coordinator. We have received the first production of records and waiting for other rolling productions. I have also approved and we have initiated payment to Lane Transit for your efforts in compiling the records on our behalf.

Could you give me an update on other responses you have received to the Charter Service Notification you sent to the registered Charter Service providers? How many other providers have indicated they are ready, willing and able to provide the services for OCF? Who are they?

We are in contact with Kirsten and have told her we will in touch with her in the next couple of weeks.

Thanks,
Kumar

From: Bret Smith <Bret.Smith@ltd.org>
Sent: Monday, December 29, 2025 1:32 PM
To: kumar accelar.com <kumar@accelar.com>
Cc: Customer Service <CS@accelar.com>; kbolton@oregoncountryfair.org
Subject: RE: [External Sender]Confirmation of Pronto Availability – Charter Service (49 CFR Part 604.14)

Dear Kumar,

Thank you for your detailed response to Lane Transit District's charter service notice dated December 24, 2025, regarding shuttle service for the 2026 Oregon Country Fair. We acknowledge Pronto Journeys' confirmation that it is a registered private charter transportation provider and that it is willing and able to provide the full scope of services described in the notice.

Consistent with 49 CFR Part 604 and based on your affirmative response, Lane Transit District understands that it would not directly provide charter service for this event, as a willing and able registered private charter provider has come forward.

For coordination purposes, the primary contact for the Oregon Country Fair is:

Kirsten Bolton
Oregon Country Fair
Email: kbolton@oregoncountryfair.org
Phone: 541-343-4298

Please note that Lane Transit District requests to be notified as soon as possible if Accelar, Inc. dba Pronto Journeys withdraws its interest or is unable to provide the charter service described. Timely notice is essential to allow for compliance with federal requirements and to ensure adequate transportation planning for the event.

If additional information or documentation is required please reach out to Kirsten Bolton from Oregon Country fair.

Sincerely,

Bret Smith

Lane Transit District
Senior Service Planner
P:541-682-6191 | F: 541- 682-6111
Contact us at ltd.org



From: kumar accelar.com <kumar@accelar.com>
Sent: Friday, December 26, 2025 8:47 AM
To: Bret Smith <Bret.Smith@ltd.org>
Cc: Customer Service <CS@accelar.com>
Subject: [External Sender]Confirmation of Pronto Availability – Charter Service (49 CFR Part 604.14)

You don't often get email from kumar@accelar.com. [Learn why this is important](#)

Dear Bret,

Thank you for Lane Transit District's charter service notice dated December 24, 2025, issued pursuant to **49 CFR Part 604.14**, regarding shuttle service for the **2026 Oregon Country Fair**.

This letter serves as Pronto Journeys' **formal confirmation for the record** that we are a **registered private charter transportation provider (FTA Charter Registration ID: 6643)** and are **willing and able to provide the full scope of charter shuttle services** described in your notice, including but not limited to:

- Service dates: **July 10–12, 2026**
- Operating hours: **10:00 a.m. – 9:00 p.m.**
- Deployment of a minimum of **20 full-size, ADA-accessible buses**
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- Operation on gravel roads and constrained site-access routes
- Provision of appropriate on-site ground operations support

As stated in LTD's notice, Lane Transit District would only provide this charter service **in the absence of any willing and able registered private charter provider**. Given Pronto's affirmative response and demonstrated capability, **the conditions under which LTD could lawfully provide this charter service are not met**.

Accordingly, and consistent with the **FTA Charter Service Rule**, we understand that Lane Transit District will **step aside from directly providing this charter service**, allowing the service to be provided by a registered private charter operator.

Capacity Contingency (Leasing Only)

For clarity and completeness, Pronto's operational plan contemplates that **if aggregate private charter capacity were to be fully exhausted**, Pronto may **reach out to Lane Transit District to lease buses and/or drivers strictly as supplemental capacity**, under **Pronto's operational direction and control**, and **not as charter**

service operated by LTD. Any such leasing arrangement would be structured to remain fully compliant with **49 CFR Part 604**, with Pronto remaining the charter service provider of record.

Please advise if LTD requires any additional documentation from Pronto to confirm availability or qualifications, or if there are administrative next steps to formally close out LTD's charter notice for this event.

We appreciate LTD's adherence to federal charter service requirements and look forward to working collaboratively to support the Oregon Country Fair with safe, reliable, and compliant transportation services.

Sincerely,
Kumar Shah

Kumar Shah
President & CEO
Accelar, Inc. dba Pronto Journeys
84 W Santa Clara St
Suite 700
San Jose, CA 95113
kumar@accelar.com
650.249.7418 (w)
408.472.5662 (mobile)

From: Bret Smith <Bret.Smith@ltd.org>
Sent: Wednesday, December 24, 2025 10:40 AM
To: Bret Smith <Bret.Smith@ltd.org>
Subject: 2026 Oregon Country Fair charter posting

In compliance with FTA rules 49 CFR Ch. VI 604.14 Lane Transit District is providing notice to registered private charter providers on behalf of the Oregon Country Fair (OCF). Lane Transit District is reaching out to registered private charter providers to determine interest to provide charter shuttle service between the park and ride and the event venue.

Lane Transit District has interest in providing this service if there are no registered charter providers who show interest to provide this service.

Thank you,

Bret Smith
Lane Transit District
Senior Service Planner
P:541-682-6191 | F: 541- 682-6111
Contact us at ltd.org



Kumar Shah

From: Kumar Shah
Sent: Monday, February 16, 2026 9:02 AM
To: bret.smith@ltd.org
Cc: Pronto Journeys
Subject: RE: 2026 Oregon Country Fair charter posting

Good morning Bret,
I called you a minute ago, but got your voicemail.

We have received all the records and documents in response to our CPRA request. Your prompt response is much appreciated. We are just waiting for a response to the updated request from last week regarding the actual # of attendees who took the shuttle in the past few years.

One other question we have for you is the type of buses you have been using for these shuttle services. What is the capacity of these buses? Could you share with us pictures? We understand you have been running 20 buses each day for the three days of the event. Could you verify / confirm that number?

We will also submit this as part of our CPRA request. Just thought if you have this information readily available then you'd share with us to help us complete our analysis.

I also want to let you know that we are planning a site visit to OCF the 1st or 2nd week of March. We'd like to meet with you / member(s) of your team so you can share with us how you have operated the shuttle services in years past. Let me know if we will be meeting you or another designated representative of LTD for the site visit.

Thanks,
Kumar



The image is a business card for Pronto Journeys. It features a yellow background with a black circle on the left containing the word 'Pronto' in white. To the right of the circle, the company name 'Pronto Journeys' is written in a large, bold, black font, with the tagline 'Safe. Dependable. Comfortable.' in a smaller, italicized font below it. A small image of a dog's head is in the top right corner. The card is divided into two main sections. The left section contains the text: 'Group Transportation since 2005', '60K+ Trips. 2.4M+ Passengers.', '100% Injury-free', and 'RATING: 4.93 / 5.0' with five yellow stars. The right section contains the text: 'Kumar Shah, President', '+1-650-249-7418', 'Kumar@ProntoJourneys.com', and '84 W Santa Clara St, Ste 700 San Jose, CA 95113'. At the bottom, there are five small images of different types of vehicles: a large white bus, a smaller white bus, a white van, a white truck, and a white car.

----- Forwarded message -----

From: Bret Smith
Date: Dec 24, 2025 12:40
Subject: 2026 Oregon Country Fair charter posting
To: Bret Smith
Cc:

In compliance with FTA rules 49 CFR Ch. VI 604.14 Lane Transit District is providing notice to registered private charter providers on behalf of the Oregon Country Fair (OCF). Lane Transit District is reaching out to registered private charter providers to determine interest to provide charter shuttle service between the park and ride

and the event venue.

Lane Transit District has interest in providing this service if there are no registered charter providers who show interest to provide this service.

Thank you,

Bret Smith

Lane Transit District

Senior Service Planner

P:541-682-6191 | F: 541- 682-6111

Contact us at ltd.org



Pronto Journeys

From: Bret Smith <Bret.Smith@ltd.org>
Sent: Tuesday, February 17, 2026 8:47 AM
To: Kumar Shah
Cc: Pronto Journeys; Heather Lindsay
Subject: RE: [External Sender]RE: 2026 Oregon Country Fair charter posting

Good morning Kumar,

Thank you for your message, and I apologize for missing your call. Monday was a holiday for LTD staff, and our offices were closed.

In response to your questions, LTD operates standard city transit buses for the Oregon Country Fair shuttle service. These are the same buses used in our regular fixed-route service and can be viewed on our website or by an image search for Lane Transit District buses online.

For OCF service, we primarily utilize 60-foot articulated transit buses, along with 40-foot standard transit buses. Both bus types are equipped with two wheelchair securement bays and provide approximately 35 seated positions. However, the service operates with standing capacity. The buses are generally packed to capacity during peak times. When operating at full load, the 60-foot buses can carry approximately 100 passengers, and the 40-foot buses approximately 75 passengers.

Service levels vary slightly by day based on vehicle availability and operational needs. The maximum deployment is typically up to 20 buses per day. In recent years, due to fleet availability constraints, Friday peak service has sometimes operated with fewer vehicles. The total number of buses used each day is reflected in the FTA Charter Exceptions Reporting forms previously provided. Generally, 12 articulated (60-foot) buses operate throughout all three event days, barring any mechanical issues.

Regarding your planned site visit during the first or second week of March, I cannot confirm availability at this time. Once your dates are finalized, please let me know and I will check whether an Operations Supervisor or other appropriate staff member is available to meet with you. Please note that I will be out of the country from February 25 through March 9 and will not have email access during that time. I have added Heather who can follow up if I am unavailable.

You should receive the requested ridership info soon through your records request.

Please let me know if you need anything further in the meantime.

Best regards,

Bret Smith

Planning & Development | Senior Service Planner

P:541-682-6191



From: Kumar Shah <kumar@prontojourneys.com>
Sent: Monday, February 16, 2026 9:02 AM
To: Bret Smith <Bret.Smith@ltd.org>
Cc: Pronto Journeys <cs@prontojourneys.com>
Subject: [External Sender]RE: 2026 Oregon Country Fair charter posting

EXTERNAL SENDER: This message originated outside of Lane Transit District. Unexpected messages should be verified before links or attachments are opened.

Good morning Bret,
I called you a minute ago, but got your voicemail.

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Thanks,
Kumar



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Group Transportation since 2005
60K+ Trips. 2.4M+ Passengers.
100% Injury-free

RATING: 4.93 / 5.0
★★★★★

Kumar Shah, President
+1-650-249-7418
Kumar@ProntoJourneys.com
84 W Santa Clara St, Ste 700
San Jose, CA 95113

Images of various Pronto Journeys vehicles: a large blue and white bus, a smaller white bus, a white van, and a white truck.

----- Forwarded message -----

From: Bret Smith
Date: Dec 24, 2025 12:40
Subject: 2026 Oregon Country Fair charter posting
To: Bret Smith
Cc:

In compliance with FTA rules 49 CFR Ch. VI 604.14 Lane Transit District is providing notice to registered private charter providers on behalf of the Oregon Country Fair (OCF). Lane Transit District is reaching out to registered private charter providers to determine interest to provide charter shuttle service between the park and ride

and the event venue.

Lane Transit District has interest in providing this service if there are no registered charter providers who show interest to provide this service.

Thank you,

Bret Smith

Lane Transit District

Senior Service Planner

P:541-682-6191 | F: 541- 682-6111

Contact us at ltd.org



Pronto Journeys

From: Pronto Journeys
Sent: Wednesday, February 18, 2026 4:54 PM
To: 'Bret Smith'
Cc: Heather Lindsay; Pronto Affiliates; Kumar Shah
Subject: RE: [External Sender]OCF Shuttle - Operational Timing Data

Importance: High



Hi Bret,
Kumar has briefed us on his conversation with you and shared with us the route related information you shared with him. Appreciate all the insights you have shared with him.

Here is the map of the OCF area and the route from Eugene (highlighted in navy blue). Based on the conversation today, we understand the routes are :

Eugene to OCF (Upload)

- Bus Rd to Nansleeze Rd up to Dragon Plaza (Dragon Gate) to unload
- Nansleeze Rd to Aero Rd and then head back to Eugene on Suttle Road

Staging on Nansleeze Road

OCF to Eugene (Download)

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Is this correct? Any other details / insights you can share with us?

We are planning to do a 'dry run' of the route this week – most likely on Friday. Would a member of your team be available to accompany our team / guide them? I know it's an unusual ask, but thought we'd run it by you. If you are not able to do it, we'd absolutely understand. If you are able to do it, we'd appreciate it.

Thanks,
Sophia

From: Bret Smith <Bret.Smith@ltd.org>
Sent: Wednesday, February 18, 2026 12:22 PM
To: Kumar Shah <kumar@prontojourneys.com>
Cc: Pronto Journeys <cs@prontojourneys.com>; Heather Lindsay <Heather.Lindsay@ltd.org>
Subject: RE: [External Sender]OCF Shuttle - Operational Timing Data

Kumar,
Let's plan on a phone conversation to finish up on a few of your questions.

I am available today from 13:30 till 14:30 or Thursday from 14:30 till 15:30. Will either of these times work for you?

Thank you,
Bret

Bret Smith

Planning & Development | Senior Service Planner
P:541-682-6191



From: Kumar Shah <kumar@prontojourneys.com>
Sent: Tuesday, February 17, 2026 7:29 PM
To: Bret Smith <Bret.Smith@ltd.org>
Cc: Pronto Journeys <cs@prontojourneys.com>; Heather Lindsay <Heather.Lindsay@ltd.org>
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Hi Heather,
Good to e-meet you.

Hi Bret,
Thank you for the detailed information regarding vehicle types and deployment levels — very helpful.

I am impressed with the level of detail and stats you keep for these shuttles. To complete our operational modeling, could you please provide, for each of the past three event years (by day if available):

- Minimum, maximum, and average trip times:
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 - Dedicated lanes
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 - Signal priority
 - Law enforcement coordination
- Staging & Layover Practices
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This will allow us to accurately model cycle times and fleet requirements.

Thank you again for your prompt responses and your insights.

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From: Bret Smith <Bret.Smith@ltd.org>
Sent: Tuesday, February 17, 2026 8:47 AM
To: Kumar Shah <kumar@prontojourneys.com>
Cc: Pronto Journeys <cs@prontojourneys.com>; Heather Lindsay <Heather.Lindsay@ltd.org>
Subject: RE: [External Sender]RE: 2026 Oregon Country Fair charter posting

Good morning Kumar,

Thank you for your message, and I apologize for missing your call. Monday was a holiday for LTD staff, and our offices were closed.

In response to your questions, LTD operates standard city transit buses for the Oregon Country Fair shuttle service. These are the same buses used in our regular fixed-route service and can be viewed on our website or by an image search for Lane Transit District buses online.

For OCF service, we primarily utilize 60-foot articulated transit buses, along with 40-foot standard transit buses. Both bus types are equipped with two wheelchair securement bays and provide approximately 35 seated positions. However, the service operates with standing capacity. The buses are generally packed to capacity during peak times. When operating at full load, the 60-foot buses can carry approximately 100 passengers, and the 40-foot buses approximately 75 passengers.

Service levels vary slightly by day based on vehicle availability and operational needs. The maximum deployment is typically up to 20 buses per day. In recent years, due to fleet availability constraints, Friday peak service has sometimes operated with fewer vehicles. The total number of buses used each day is reflected in the FTA Charter Exceptions Reporting forms previously provided. Generally, 12 articulated (60-foot) buses operate throughout all three event days, barring any mechanical issues.

Regarding your planned site visit during the first or second week of March, I cannot confirm availability at this time. Once your dates are finalized, please let me know and I will check whether an Operations Supervisor or other appropriate staff member is available to meet with you. Please note that I will be out

of the country from February 25 through March 9 and will not have email access during that time. I have added Heather who can follow up if I am unavailable.

You should receive the requested ridership info soon through your records request.

Please let me know if you need anything further in the meantime.

Best regards,

Bret Smith

Planning & Development | Senior Service Planner

P:541-682-6191



From: Kumar Shah <kumar@prontojourneys.com>
Sent: Monday, February 16, 2026 9:02 AM
To: Bret Smith <Bret.Smith@ltd.org>
Cc: Pronto Journeys <cs@prontojourneys.com>
Subject: [External Sender]RE: 2026 Oregon Country Fair charter posting

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To: Bret Smith
Cc:

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Lane Transit District has interest in providing this service if there are no registered charter providers who show interest to provide this service.

Thank you,

Bret Smith

Lane Transit District

Senior Service Planner

P:541-682-6191 | F: 541- 682-6111

Contact us at ltd.org



Lane Transit District

Pronto Journeys

From: Pronto Affiliates
Sent: Thursday, February 19, 2026 11:36 AM
To: Bret Smith; Pronto Journeys
Cc: Heather Lindsay; Kumar Shah
Subject: RE: [External Sender]RE: OCF Dry Run

Got it. We are in touch with the OCF team to work out the details for the site visit / dry run. Thanks.

From: Bret Smith <Bret.Smith@ltd.org>
Sent: Thursday, February 19, 2026 5:19 AM
To: Pronto Journeys <cs@prontojourneys.com>
Cc: Heather Lindsay <Heather.Lindsay@ltd.org>; Pronto Affiliates <affiliates@prontojourneys.com>; Kumar Shah <kumar@prontojourneys.com>
Subject: RE: [External Sender]RE: OCF Dry Run

It is all private property. You will need to make arrangements to meet someone from OCF for a sight visit and details.

Thanks,

Bret

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: Pronto Journeys <cs@prontojourneys.com>
Date: 2/18/26 9:22 PM (GMT-08:00)
To: Bret Smith <Bret.Smith@ltd.org>
Cc: Heather Lindsay <Heather.Lindsay@ltd.org>, Pronto Affiliates <affiliates@prontojourneys.com>, Kumar Shah <kumar@prontojourneys.com>, Pronto Journeys <cs@prontojourneys.com>
Subject: [External Sender]RE: OCF Dry Run

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One more question: we have not been able to find the location of the parking lot and access roads to / from the parking lot. We are assuming they are isolated from the shuttle routes, but just wanted to make sure we understand the traffic patterns. We also noticed there are several campgrounds adjacent to the OCF site and not too far from the route / Suttle Road. We are assuming that starting with the turn into Bus Rd, the shuttles will have exclusive access to Bus Rd, Nansleeze Rd, and Aero Rd. Could you kindly confirm?

From: Pronto Journeys <cs@prontojourneys.com>

Sent: Wednesday, February 18, 2026 5:09 PM

To: Bret Smith <Bret.Smith@ltd.org>

Cc: Heather Lindsay <Heather.Lindsay@ltd.org>; Pronto Journeys <cs@prontojourneys.com>; Pronto Affiliates <affiliates@prontojourneys.com>

Subject: OCF Dry Run

Bret,

FYI - We are planning to do the 'dry run' in a motorcoach on Friday, 02/20, afternoon.

Sophia

From: Pronto Journeys <cs@prontojourneys.com>

Sent: Wednesday, February 18, 2026 4:54 PM

To: Bret Smith <Bret.Smith@ltd.org>

Cc: Heather Lindsay <Heather.Lindsay@ltd.org>; Pronto Affiliates <affiliates@prontojourneys.com>; Kumar Shah <kumar@prontojourneys.com>

Subject: RE: [External Sender]OCF Shuttle - Operational Timing Data

Importance: High

Hi Bret,

Kumar has briefed us on his conversation with you and shared with us the route related information you shared with him. Appreciate all the insights you have shared with him.



Eugene on Suttle Road

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Subject: RE: [External Sender]OCF Shuttle - Operational Timing Data

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Planning & Development | Senior Service Planner

P:541-682-6191



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Planning & Development | Senior Service Planner

P:541-682-6191



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Sent: Monday, February 16, 2026 9:02 AM

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Cc: Pronto Journeys <cs@prontojourneys.com>

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Lane Transit District

Senior Service Planner

P:541-682-6191 | F: 541- 682-6111

Contact us at ltd.org



Pronto Journeys

From: Pronto Journeys
Sent: Wednesday, February 25, 2026 3:05 PM
To: Bret Smith
Cc: Pronto Journeys; Kumar Shah
Subject: Formal Request for Vehicles, Operators, and Staff Leasing – Oregon Country Fair 2026

Importance: High

Dear Bret,
I hope you are well.

As you are aware, Pronto Journeys responded affirmatively to the 2026 Oregon Country Fair charter posting and has since conducted route validation, operational modeling, and fleet sourcing efforts in preparation for service delivery.

After exhausting available private motorcoach options and in light of site-specific constraints communicated by the event organizer, using motorcoaches for OCF is not a viable option because OCF is unwilling to make requisite changes to make the OCF shuttle route safe for motorcoach travel and for the passengers. At this point, we have exhausted all available private options and we are formally invoking the leasing provisions under the FTA Charter Service Rule (49 CFR Part 604), which contemplate the leasing of vehicles and/or operators from a recipient agency when necessary to provide the requested charter service.

Under [49 CFR Part 604](#), FTA recipients may lease FTA-funded equipment and drivers to registered private charter operators only if the private provider has insufficient capacity (vehicles or accessible vehicles) to meet demand.

Key Aspects of the FTA Charter Leasing Rule (49 CFR 604.8):

- **Capacity Exception:** This is a limited exception used when a registered private charter operator needs additional capacity and cannot fulfill a request on their own.

Accordingly, Pronto Journeys wishes to enter into an agreement with Lane Transit District to lease the vehicles and operators necessary to perform the Oregon Country Fair shuttle service for July 10–12, 2026.

Per your conversation with our company President, Kumar Shah, last week, you confirmed that LTD does have the equipment and drivers available for the OCF shuttle on July 10th, 11th and 12th. We know you have operated the OCF shuttle service for the past 20+ years. We appreciate your and your team's experience and we are looking forward to working with you to make the OCF shuttle service a success. We will also be looking for OCF to provide two (2) on-site supervisors to supervise the operation of the shuttle.

We will provide shortly a detailed breakdown by day outlining:

- Estimated vehicle quantities
- Vehicle types (articulated and/or 40-foot buses)
- Estimated service windows

Our objective is to ensure continuity of service to Oregon Country Fair attendees while remaining fully compliant with the Charter Rule framework.

Kindly share your lease agreement at the earliest convenience.

We appreciate your prompt attention and look forward to your response.

Sincerely,
Sophia
Ops Supervisor
Accelar, Inc. dba Pronto Journeys
FTA Charter Registration ID: 6643



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84 W Santa Clara St, Ste 700
San Jose, CA 95113



Kumar Shah

From: Kumar Shah
Sent: Thursday, February 26, 2026 3:49 PM
To: Bret Smith; Heather Lindsay
Cc: Pronto Journeys
Subject: RE: Formal Request for Vehicles, Operators, and Staff Leasing – Oregon Country Fair 2026

Importance: High

Tracking:	Recipient	Delivery
	Bret Smith	
	Heather Lindsay	
	Pronto Journeys	Delivered: 2/26/2026 3:49 PM

Dear Bret / Heather,

Per my email dated 02-25-2026 – appended below - we responded affirmatively to the 2026 Oregon Country Fair charter posting and has since conducted route validation and detailed operational modeling based on the 2025 hourly ridership data provided by LTD.

After exhausting available private motorcoach options and in light of site-specific constraints communicated by the event organizer, we are formally invoking the leasing provisions under the FTA Charter Service Rule (49 CFR Part 604), which contemplate the leasing of vehicles and/or operators from a recipient agency when necessary to provide the requested charter service.

Based on 2025 peak hourly demand (9:00 AM–3:00 PM and 3:00 PM–9:00 PM windows), and assuming articulated vehicle capacity of approximately 80 passengers per bus, our peak simultaneous vehicle requirements are as follows:

- **Friday (July 10, 2026) – 6 articulated buses**
- **Saturday (July 11, 2026) – 7 articulated buses**
- **Sunday (July 12, 2026) – 6 articulated buses**

Accordingly, Pronto Journeys formally requests that Lane Transit District make available or lease the above-referenced vehicles and corresponding operators for the specified service dates.

For clarity, we are sharing with you a detailed schedule summary - appended as Exhibit A below - reflecting peak half-day vehicle requirements.

Kindly also share with us your 2026 Hourly Rates for your buses and for Supervisory staff.

We appreciate your prompt attention and look forward to your response.

Sincerely,
Kumar Shah
President & CEO

Exhibit A

Oregon Country Fair 2026 – Peak Vehicle Leasing Requirements

(Based on 2025 Hourly Ridership Baseline)

Date	Morning Window (9 AM – 3 PM)	Afternoon Window (3 PM – 9 PM)	Peak Requirement	Vehicle Type
Friday – July 10	4	6	6	60- 7 Articulated
Saturday – July 11	5	7	7	60- 7 Articulated
Sunday – July 12	4	6	6	60- 7 Articulated

Assumptions:

- Peak hourly demand within each half-day window used for sizing
- 80-passenger effective capacity per articulated bus
- Demand-driven provisioning model
- Quantities represent peak simultaneous requirement



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Images of various Pronto Journeys vehicles: a large white bus, a smaller white bus, a white van, and a white truck.

From: Pronto Journeys <cs@prontojourneys.com>

Sent: Wednesday, February 25, 2026 3:05 PM

To: Bret Smith <bret.smith@ltd.org>

Cc: Pronto Journeys <cs@prontojourneys.com>; Kumar Shah <kumar@prontojourneys.com>

Subject: Formal Request for Vehicles, Operators, and Staff Leasing – Oregon Country Fair 2026

Importance: High

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San Jose, CA 95113

Pronto

Images of various vehicles: a large motorcoach, a smaller motorcoach, a pickup truck, a box truck, and a van.

Kumar Shah

From: Kumar Shah
Sent: Tuesday, March 3, 2026 7:36 AM
To: Bret Smith; Heather Lindsay
Cc: Pronto Journeys
Subject: RE: Formal Request for Vehicles, Operators, and Staff Leasing – Oregon Country Fair 2026 - Kindly respond by Friday, 03-06-2026

Importance: High

Tracking:	Recipient	Delivery
	Bret Smith	
	Heather Lindsay	
	Pronto Journeys	Delivered: 3/3/2026 7:36 AM

Dear Bret & Heather,

I hope you are well.

I am writing to follow up on our formal request dated 02/26/2026 regarding the leasing of vehicles, operators, and supervisory staff from LTD for the 2026 Oregon Country Fair (OCF) shuttle service.

As you know, planning timelines for this event require clarity in the coming days so that we can finalize service structure and ensure continuity for attendees.

You have indicated that LTD has been operating the shuttle services for OCF for the past 20+ years. You have also indicated that if Pronto Corporation were to back out from providing the shuttle services then LTD will step back in and provide the services. Thank you for confirming availability of vehicles, operators, and supervisory staff to operate the service. Pronto intends to provide the OCF shuttle services and would like to enter into a leasing agreement with LTD for the requisite vehicles, operators, and supervisory staff.

We would appreciate written confirmation from LTD by Friday, March 6th, 2026, of the leasing arrangement pursuant to 49 CFR Part 604.8 for the vehicle quantities previously outlined, and your hourly rates for vehicles / operators, and supervisory staff.

If LTD requires any additional information from us to evaluate this request, please let us know and we will provide it promptly.

We look forward to your response.

Sincerely,
Kumar Shah
President & CEO
Accelar, Inc. dba Pronto Journeys
FTA Charter Registration ID: 6643



From: Kumar Shah
Sent: Thursday, February 26, 2026 3:49 PM
To: Bret Smith <bret.smith@ltd.org>; Heather Lindsay <heather.lindsay@ltd.org>
Cc: Pronto Journeys <cs@prontojourneys.com>
Subject: RE: Formal Request for Vehicles, Operators, and Staff Leasing – Oregon Country Fair 2026
Importance: High

Dear Bret / Heather,

Per my email dated 02-25-2026 – appended below - we responded affirmatively to the 2026 Oregon Country Fair charter posting and has since conducted route validation and detailed operational modeling based on the 2025 hourly ridership data provided by LTD.

After exhausting available private motorcoach options and in light of site-specific constraints communicated by the event organizer, we are formally invoking the leasing provisions under the FTA Charter Service Rule (49 CFR Part 604), which contemplate the leasing of vehicles and/or operators from a recipient agency when necessary to provide the requested charter service.

Based on 2025 peak hourly demand (9:00 AM–3:00 PM and 3:00 PM–9:00 PM windows), and assuming articulated vehicle capacity of approximately 80 passengers per bus, our peak simultaneous vehicle requirements are as follows:

- **Friday (July 10, 2026) – 6 articulated buses**
- **Saturday (July 11, 2026) – 7 articulated buses**
- **Sunday (July 12, 2026) – 6 articulated buses**

Accordingly, Pronto Journeys formally requests that Lane Transit District make available for lease the above-referenced vehicles and corresponding operators for the specified service dates.

For clarity, we are sharing with you a detailed schedule summary - appended as Exhibit A below - reflecting peak half-day vehicle requirements.

Kindly also share with us your 2026 Hourly Rates for your buses and for Supervisory staff.

We appreciate your prompt attention and look forward to your response.

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Kumar Shah
President & CEO

Exhibit A

Oregon Country Fair 2026 – Peak Vehicle Leasing Requirements

(Based on 2025 Hourly Ridership Baseline)

Date	Morning Window (9 AM – 3 PM)	Afternoon Window (3 PM – 9 PM)	Peak Requirement	Vehicle Type
Friday – July 10	4	6	6	60-ft Articulated
Saturday – July 11	5	7	7	60-ft Articulated
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Assumptions:

- Peak hourly demand within each half-day window used for sizing
- 80-passenger effective capacity per articulated bus
- Demand-driven provisioning model
- Quantities represent peak simultaneous requirement



Pronto Journeys
Safe. Dependable. Comfortable.

Group Transportation since 2005
60K+ Trips. 2.4M+ Passengers.
100% Injury-free

RATING: 4.93 / 5.0
★★★★★

Kumar Shah, President
+1-650-249-7418
Kumar@ProntoJourneys.com
84 W Santa Clara St, Ste 700
San Jose, CA 95113

Pronto

Images of various Pronto Journeys vehicles: a large blue and white articulated bus, a smaller white bus, a white van, and a white pickup truck.

From: Pronto Journeys <cs@prontojourneys.com>

Sent: Wednesday, February 25, 2026 3:05 PM

To: Bret Smith <bret.smith@ltd.org>

Cc: Pronto Journeys <cs@prontojourneys.com>; Kumar Shah <kumar@prontojourneys.com>

Subject: Formal Request for Vehicles, Operators, and Staff Leasing – Oregon Country Fair 2026

Importance: High

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Under [49 CFR Part 604](#), FTA recipients may lease FTA-funded equipment and drivers to registered private charter operators only if the private provider has insufficient capacity (vehicles or accessible vehicles) to meet demand.

Key Aspects of the FTA Charter Leasing Rule (49 CFR 604.8):

- **Capacity Exception:** This is a limited exception used when a registered private charter operator needs additional capacity and cannot fulfill a request on their own.

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Per your conversation with our company President, Kumar Shah, last week, you confirmed that LTD does have the equipment and drivers available for the OCF shuttle on July 10th, 11th and 12th. We know you have operated the OCF shuttle service for the past 20+ years. We appreciate your and your team's experience and we are looking forward to working with you to make the OCF shuttle service a success. We will also be looking for OCF to provide two (2) on-site supervisors to supervise the operation of the shuttle.

We will provide shortly a detailed breakdown by day outlining:

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Our objective is to ensure continuity of service to Oregon Country Fair attendees while remaining fully compliant with the Charter Rule framework.

Kindly share your lease agreement at the earliest convenience.

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Sincerely,

Sophia

Ops Supervisor

Accelar, Inc. dba Pronto Journeys

FTA Charter Registration ID: 6643



Kumar Shah

From: Dave Roth <Dave.Roth@ltd.org>
Sent: Tuesday, March 3, 2026 11:23 AM
To: Kumar Shah; Pronto Journeys
Cc: Heather Lindsay; Bret Smith; Eric Breitenstein
Subject: RE: Formal Request for Vehicles, Operators, and Staff Leasing – Oregon Country Fair 2026 - Kindly respond by Friday, 03-06-2026

Dear Kumar and Sophia,

Thank you for your correspondence and for the information Pronto Journeys has provided in connection with your request to lease LTD vehicles, operators, and supervisory staff for the 2026 Oregon Country Fair shuttle service.

LTD has carefully reviewed your request in light of the applicable federal regulations governing the leasing of FTA-funded equipment and drivers. After review, LTD has determined that the request does not meet the requirements of 49 C.F.R. § 604.8 and must respectfully decline.

We wish Pronto Journeys well in securing an alternative service solution for this event.

Sincerely,

Dave Roth
Planning & Development | Director of Mobility Planning and Policy
P: 541.682.6116
C: 971.258.3581
dave.roth@ltd.org

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which contemplate the leasing of vehicles and/or operators from a recipient agency when necessary to provide the requested charter service.

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Under [49 CFR Part 604](#), FTA recipients may lease FTA-funded equipment and drivers to registered private charter operators only if the private provider has insufficient capacity (vehicles or accessible vehicles) to meet demand.

Key Aspects of the FTA Charter Leasing Rule (49 CFR 604.8):

- **Capacity Exception:** This is a limited exception used when a registered private charter operator needs additional capacity and cannot fulfill a request on their own.

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Kumar Shah

From: Kumar Shah
Sent: Tuesday, March 3, 2026 2:02 PM
To: Dave Roth
Cc: Heather Lindsay; Bret Smith; Eric Breitenstein; Pronto Journeys
Subject: Clarification Request – § 604.8 Leasing Determination

Importance: High

Dear Dave,
Thank you for your response.

To ensure clarity and a complete understanding of LTD's position, we respectfully request identification of the specific requirement under 49 C.F.R. § 604.8 that LTD believes Pronto Journeys does not satisfy.

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We meet all the requirements of **§ 604.8 (a)**:

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We appreciate your clarification.

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Kumar Shah, President
+1-650-249-7418
Kumar@ProntoJourneys.com
84 W Santa Clara St, Ste 700
San Jose, CA 95113



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Accelar, Inc. dba Pronto Journeys

FTA Charter Registration ID: 6643



Kumar Shah

From: Kumar Shah
Sent: Thursday, March 5, 2026 2:46 PM
To: Dave Roth
Cc: Heather Lindsay; Bret Smith; Eric Breitenstein; Pronto Journeys
Subject: Oregon Country Fair Shuttle Service – Exploring a Cooperative Path Forward

Dear Dave,

Thank you for your response and for the time you and your team have taken to review our request.

We understand LTD's position regarding \$604.8 and appreciate the care with which you have evaluated the regulatory considerations.

Stepping back from the regulatory details for a moment, our objective is the same as yours and Oregon Country Fair's: ensuring that the shuttle service continues to operate for the benefit of the Veneta community and the tens of thousands of attendees who rely on it each year.

LTD has successfully operated this service for more than two decades, and we recognize the pride of ownership your organization and your staff have developed through that long history of service. The event and the surrounding community have clearly benefited from LTD's commitment and operational expertise.

As you know, based on our discussions with OCF and our review of the site conditions and established routing, it appears that the only vehicles capable of operating the existing shuttle route are transit-style buses. Because of this, the practical reality is that the only way the shuttle service can continue in 2026 is through some form of cooperation between LTD and Pronto.

Our intent is not to displace LTD's role in serving the event, but rather to find a structure that allows the service to continue while respecting the operational and regulatory constraints we are all navigating.

The buses and equipment we have discussed leasing are public assets entrusted to LTD for the purpose of serving the community. Ensuring that the Oregon Country Fair shuttle service continues would directly advance that shared public mission.

From a practical standpoint, a cooperative structure between LTD and Pronto could allow:

- Continuity of shuttle service for OCF attendees and the Veneta community
- Continued involvement of LTD vehicles, drivers, and supervisory staff
- A structure under which Pronto administers the charter service while working collaboratively with LTD

In many respects, the operation would look very similar to the service LTD has successfully provided for many years under your agreement with OCF, except that it would now operate within a cooperative framework between our organizations.

I also want to point out that Pronto also maintains its own insurance coverage and risk management policies as per the Federal DOT / FMCSA guidelines and mandatory coverage requirements, which would provide an additional layer of protection alongside LTD's existing coverage. When working directly with OCF, you / LTD did not have the benefit or the protection of this additional layer of coverage.

To be clear, we are not asking LTD to reconsider its regulatory determination in this message. Rather, we want to work collaboratively with you to develop a practical and compliant structure that allows the shuttle service to continue while respecting LTD's regulatory responsibilities and while ensuring LTD's continued involvement in the delivery of the services.

For the sake of the Oregon Country Fair organization, the Veneta community, and the tens of thousands of attendees who rely on this transportation service each year, let's work together to create such a structure, which has already been envisioned and codified in FTA Charter Rule 604.8. We know FTA, the regional administrator, and the Charter Ombudsman would welcome and bless this private-public cooperation for the benefit of the public.

We'd like to schedule a conversation with the key stakeholders on both sides at the earliest, so together we can then share with OCF / Kirsten and the community the details of this structure. Please suggest a couple of time options tomorrow – Friday, 03/06 – for this conversation.

Respectfully,
Kumar Shah
President & CEO
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To: Dave Roth <Dave.Roth@ltd.org>
Cc: Heather Lindsay <Heather.Lindsay@ltd.org>; Bret Smith <Bret.Smith@ltd.org>; Eric Breitenstein <Eric.Breitenstein@ltd.org>; Pronto Journeys <cs@prontojourneys.com>
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Importance: High

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We meet all the requirements of **§ 604.8 (a)**:

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Dear Kumar and Sophia,

Thank you for your correspondence and for the information Pronto Journeys has provided in connection with your request to lease LTD vehicles, operators, and supervisory staff for the 2026 Oregon Country Fair shuttle service.

LTD has carefully reviewed your request in light of the applicable federal regulations governing the leasing of FTA-funded equipment and drivers. After review, LTD has determined that the request does not meet the requirements of 49 C.F.R. § 604.8 and must respectfully decline.

We wish Pronto Journeys well in securing an alternative service solution for this event.

Sincerely,

Dave Roth
Planning & Development | Director of Mobility Planning and Policy
P: 541.682.6116
C: 971.258.3581
dave.roth@ltd.org

From: Kumar Shah <kumar@prontojourneys.com>
Sent: Tuesday, March 3, 2026 7:36 AM
To: Bret Smith <Bret.Smith@ltd.org>; Heather Lindsay <Heather.Lindsay@ltd.org>
Cc: Pronto Journeys <cs@prontojourneys.com>
Subject: [External Sender]RE: Formal Request for Vehicles, Operators, and Staff Leasing – Oregon Country Fair 2026 -
Kindly respond by Friday, 03-06-2026
Importance: High

EXTERNAL SENDER: This message originated outside of Lane Transit District. Unexpected messages should be verified before links or attachments are opened.

Dear Bret & Heather,

I hope you are well.

I am writing to follow up on our formal request dated 02/26/2026 regarding the leasing of vehicles, operators, and supervisory staff from LTD for the 2026 Oregon Country Fair (OCF) shuttle service.

As you know, planning timelines for this event require clarity in the coming days so that we can finalize service structure and ensure continuity for attendees.

You have indicated that LTD has been operating the shuttle services for OCF for the past 20+ years. You have also indicated that if Pronto Corporation were to back out from providing the shuttle services then LTD will step back in and provide the services. Thank you for confirming availability of vehicles, operators, and supervisory staff to operate the service. Pronto intends to provide the OCF shuttle services and would like to enter into a leasing agreement with LTD for the requisite vehicles, operators, and supervisory staff.

We would appreciate written confirmation from LTD by Friday, March 6th, 2026, of the leasing arrangement pursuant to 49 CFR Part 604.8 for the vehicle quantities previously outlined, and your hourly rates for vehicles / operators, and supervisory staff.

If LTD requires any additional information from us to evaluate this request, please let us know and we will provide it promptly.

We look forward to your response.

Sincerely,
Kumar Shah
President & CEO
Accelar, Inc. dba Pronto Journeys
FTA Charter Registration ID: 6643



From: Kumar Shah
Sent: Thursday, February 26, 2026 3:49 PM
To: Bret Smith <bret.smith@ltd.org>; Heather Lindsay <heather.lindsay@ltd.org>
Cc: Pronto Journeys <cs@prontojourneys.com>
Subject: RE: Formal Request for Vehicles, Operators, and Staff Leasing – Oregon Country Fair 2026
Importance: High

Dear Bret / Heather,

Per my email dated 02-25-2026 – appended below - we responded affirmatively to the 2026 Oregon Country Fair charter posting and has since conducted route validation and detailed operational modeling based on the 2025 hourly ridership data provided by LTD.

After exhausting available private motorcoach options and in light of site-specific constraints communicated by the event organizer, we are formally invoking the leasing provisions under the FTA Charter Service Rule (49 CFR Part 604), which contemplate the leasing of vehicles and/or operators from a recipient agency when necessary to provide the requested charter service.

Based on 2025 peak hourly demand (9:00 AM–3:00 PM and 3:00 PM–9:00 PM windows), and assuming articulated vehicle capacity of approximately 80 passengers per bus, our peak simultaneous vehicle requirements are as follows:

- **Friday (July 10, 2026) – 6 articulated buses**
- **Saturday (July 11, 2026) – 7 articulated buses**
- **Sunday (July 12, 2026) – 6 articulated buses**

Accordingly, Pronto Journeys formally requests that Lane Transit District make available for lease the above-referenced vehicles and corresponding operators for the specified service dates.

For clarity, we are sharing with you a detailed schedule summary - appended as Exhibit A below - reflecting peak half-day vehicle requirements.

Kindly also share with us your 2026 Hourly Rates for your buses and for Supervisory staff.

We appreciate your prompt attention and look forward to your response.

Sincerely,
Kumar Shah
President & CEO

Exhibit A

Oregon Country Fair 2026 – Peak Vehicle Leasing Requirements

(Based on 2025 Hourly Ridership Baseline)

Date	Morning Window (9 AM – 3 PM)	Afternoon Window (3 PM – 9 PM)	Peak Requirement	Vehicle Type
Friday – July 10	4	6	6	60-ft Articulated
Saturday – July 11	5	7	7	60-ft Articulated
Sunday – July 12	4	6	6	60-ft Articulated

Assumptions:

- Peak hourly demand within each half-day window used for sizing
- 80-passenger effective capacity per articulated bus
- Demand-driven provisioning model
- Quantities represent peak simultaneous requirement



From: Pronto Journeys <cs@prontojourneys.com>

Sent: Wednesday, February 25, 2026 3:05 PM

To: Bret Smith <bret.smith@ltd.org>

Cc: Pronto Journeys <cs@prontojourneys.com>; Kumar Shah <kumar@prontojourneys.com>

Subject: Formal Request for Vehicles, Operators, and Staff Leasing – Oregon Country Fair 2026

Importance: High

Dear Bret,
I hope you are well.

As you are aware, Pronto Journeys responded affirmatively to the 2026 Oregon Country Fair charter posting and has since conducted route validation, operational modeling, and fleet sourcing efforts in preparation for service delivery.

After exhausting available private motorcoach options and in light of site-specific constraints communicated by the event organizer, using motorcoaches for OCF is not a viable option because OCF is unwilling to make requisite changes

to make the OCF shuttle route safe for motorcoach travel and for the passengers. At this point, we have exhausted all available private options and we are formally invoking the leasing provisions under the FTA Charter Service Rule (49 CFR Part 604), which contemplate the leasing of vehicles and/or operators from a recipient agency when necessary to provide the requested charter service.

Under [49 CFR Part 604](#), FTA recipients may lease FTA-funded equipment and drivers to registered private charter operators only if the private provider has insufficient capacity (vehicles or accessible vehicles) to meet demand.

Key Aspects of the FTA Charter Leasing Rule (49 CFR 604.8):

- **Capacity Exception:** This is a limited exception used when a registered private charter operator needs additional capacity and cannot fulfill a request on their own.

Accordingly, Pronto Journeys wishes to enter into an agreement with Lane Transit District to lease the vehicles and operators necessary to perform the Oregon Country Fair shuttle service for July 10–12, 2026.

Per your conversation with our company President, Kumar Shah, last week, you confirmed that LTD does have the equipment and drivers available for the OCF shuttle on July 10th, 11th and 12th. We know you have operated the OCF shuttle service for the past 20+ years. We appreciate your and your team's experience and we are looking forward to working with you to make the OCF shuttle service a success. We will also be looking for OCF to provide two (2) on-site supervisors to supervise the operation of the shuttle.

We will provide shortly a detailed breakdown by day outlining:

- Estimated vehicle quantities
- Vehicle types (articulated and/or 40-foot buses)
- Estimated service windows

Our objective is to ensure continuity of service to Oregon Country Fair attendees while remaining fully compliant with the Charter Rule framework.

Kindly share your lease agreement at the earliest convenience.

We appreciate your prompt attention and look forward to your response.

Sincerely,

Sophia

Ops Supervisor

Accelar, Inc. dba Pronto Journeys

FTA Charter Registration ID: 6643



Kumar Shah

From: Kumar Shah
Sent: Tuesday, March 10, 2026 12:44 PM
To: Dave Roth; Heather Lindsay; Bret Smith; Eric Breitenstein
Cc: ftaregion10@dot.gov; Charterservice, Ombudsman (FTA); Kumar Shah
Subject: RE: Oregon Country Fair Shuttle Service – Exploring a Cooperative Path Forward
Attachments: RE: Formal Request for Vehicles, Operators, and Staff Leasing – Oregon Country Fair 2026; Clarification Request – § 604.8 Leasing Determination; LTD Charter Service Policy 01-24-2024.pdf; RE_ [External Sender]Quote #14465-0 from Starline Luxury Coaches (1).pdf; RE: Formal Request for Vehicles, Operators, and Staff Leasing – Oregon Country Fair 2026 - Kindly respond by Friday, 03-06-2026; Oregon Country Fair Shuttle Service – Exploring a Cooperative Path Forward; RE: Ensuring Shuttle Service Certainty for OCF 2026

Importance: High

Tracking:	Recipient	Delivery
	Dave Roth	
	Heather Lindsay	
	Bret Smith	
	Eric Breitenstein	
	ftaregion10@dot.gov	
	Charterservice, Ombudsman (FTA)	
	Kumar Shah	Delivered: 3/10/2026 12:45 PM

Dear Dave, Bret, Heather and Eric,

CC:
FTA Region 10 Administrator
FTA Charter Service Ombudsman

I am following up on our email correspondence with you / LTD team as well as with Kirsten Bolton / OCF.

In this case, OCF is the requesting party. Per Kirsten's email dated March 3, 2026,

Hello Kumar,

Thank you for reaching out. Option 1 is a no go. As I have said numerous times, we will not trim our trees. Option 2 is doable, if LTD is willing to lease Pronto their vehicles. LTD is a local entity that has the ability to service our event because their vehicles can handle our site, no tree trimming required. I have cc'd LTD on this email to get confirmation that this is even an option for them.

As for a three-year contract, we would want to see if you can provide the service efficiently the first year before signing a three-year contract.

Have a nice day,

Kirsten Bolton
Executive Director
Oregon Country Fair
442 Lawrence St.
Cell#541-321-6626
Office#541-343-4298

As is evident from this email exchange and per Kirsten's acknowledgement that Option 1 – using motorcoaches – is a 'no go'. We have conclusively established that we have exhausted all available private options. Per Kirsten's email above "Option 2 – LTD Leasing Structure – is doable". She / OCF are the third party requesting the service and Kirsten has made her wishes known that she would like Pronto and LTD to work this out to ensure that she will be able to offer the shuttle service to the 12,000 – 18,000 OCF participants at this even the past 3 years.

Pursuant to this email, we are writing to follow up on our prior correspondence regarding the 2026 Oregon Country Fair shuttle service and re-submit our formal request to lease vehicles, operators, and supervisory staff from Lane Transit District pursuant to the leasing provisions of the FTA Charter Service Rule (49 C.F.R. §604.8).

As noted in our response of March 3, 2026, we requested that LTD identify the specific requirement under §604.8 that LTD believes Pronto Journeys does not satisfy. We subsequently sent another email on March 5, 2026. To date, we have not received clarification on this point, or responses to these emails.

For ease of reference, we reiterate that Pronto Journeys satisfies each of the four conditions specified in §604.8(a) – already communicated to you in our March 3, 2026 email:

1. Pronto Journeys is registered on the FTA Charter Registration website;
2. Pronto Journeys owns and operates buses in a charter service business;
3. Pronto Journeys has received a charter request that exceeds its available capacity; and
4. Pronto Journeys has exhausted available vehicles from registered charter providers within the geographic service area.

In addition, on February 26, 2026 we formally requested that LTD provide its 2026 hourly rates for articulated buses, operators, and supervisory staff in connection with potential leasing under §604.8 and shared with you our request for # of vehicles and drivers for the event. Attached please find the email. That request also remains unanswered.

As a recipient of federal funding, LTD operates under the Charter Service Rule's principles of **competitive neutrality** and **fair access**. When leasing of federally funded equipment is permitted under §604.8, it must be offered on fair and equitable terms to all registered charter providers. Providing the applicable rate schedule upon request is consistent with these principles and with general federal grant compliance requirements related to non-discrimination and transparency. Bret has already indicated that you have the requested number of vehicles, drivers, and supervisory staff required for this event, so we know availability is NOT an issue. We are assuming you have already put in place and published your leasing rates for 2026. Kindly share with us the reasons you are not able to share with us the leasing rates for equipment and staffing – which are a matter of public record.

For completeness and transparency, we are attaching the following documents referenced in this correspondence:

- LTD Charter Service Policy (January 24, 2024), which includes the leasing provisions under §604.8;
- Prior correspondence between Pronto Journeys and LTD regarding our leasing request and rate inquiry; and
- Email correspondence between LTD staff and Oregon Country Fair representatives discussing

anticipated operational constraints. This email could be construed as an obstructive action taken by LTD to marginalize the FTA Charter Rule.

We note that the attached LTD Charter Service Policy explicitly references the leasing provisions of §604.8 and the conditions under which LTD may lease FTA-funded equipment and drivers to registered charter providers. Per our response dated 03/03, we meet all of these requirements stated in your own policy document, in addition to meeting the requirements of leasing provisions of §604.8.

Our objective remains aligned with that of Oregon Country Fair: ensuring that the Veneta community and tens of thousands of fair attendees continue to have access to safe and reliable shuttle transportation, as they have for more than two decades. The only way to ensure this is for LTD to respond positively and affirmatively to our request to lease LTD resources per our email dated March 3, 2026.

Bret, we really appreciate all the insights you have shared with us and for your timely and prompt response to our CPRA requests for documents and information related to OCF. Based on the information you have shared with us, we have built a detailed and comprehensive model for the shuttle service – including hour-by-hour demand for the 3-day event. Our request to LTD for the vehicle requirements for each of the 3 days for the 2026 OCF event is based on this detailed model.

For the past 20+ years LTD has been operating the shuttle service for OCF, it was based on the requirement you received from OCF for certain number of buses. Our request is more granular and more sophisticated as part of the demand-responsive model, which we have developed and one that is a lot more efficient. We will also be working with OCF over time to integrate our shuttle service booking system with the OCF website to gain a much better understanding of source-based demand and making the service even more demand-responsive.

Kindly contact us at the earliest to structure an arrangement between Pronto and LTD that allows this service to continue in full compliance with the Charter Service Rule while ensuring the community's transportation needs are met, as requested by Kirsten Bolton, the Executive Director of OCF in her email dated March 3, 2026. Kindly respond by COB Wednesday, 03/11. We have lost considerable amount of valuable time already.

For awareness and transparency, we are copying the FTA Region 10 office and the FTA Charter Service Ombudsman on this correspondence.

Sincerely,
Kumar Shah
Pronto Journeys



From: Kumar Shah
Sent: Thursday, March 5, 2026 2:46 PM
To: Dave Roth <Dave.Roth@ltd.org>

Cc: Heather Lindsay <Heather.Lindsay@ltd.org>; Bret Smith <Bret.Smith@ltd.org>; Eric Breitenstein <Eric.Breitenstein@ltd.org>; Pronto Journeys <cs@prontojourneys.com>

Subject: Oregon Country Fair Shuttle Service – Exploring a Cooperative Path Forward

Dear Dave,

Thank you for your response and for the time you and your team have taken to review our request.

We understand LTD's position regarding \$604.8 and appreciate the care with which you have evaluated the regulatory considerations.

Stepping back from the regulatory details for a moment, our objective is the same as yours and Oregon Country Fair's: ensuring that the shuttle service continues to operate for the benefit of the Veneta community and the tens of thousands of attendees who rely on it each year.

LTD has successfully operated this service for more than two decades, and we recognize the pride of ownership your organization and your staff have developed through that long history of service. The event and the surrounding community have clearly benefited from LTD's commitment and operational expertise.

As you know, based on our discussions with OCF and our review of the site conditions and established routing, it appears that the only vehicles capable of operating the existing shuttle route are transit-style buses. Because of this, the practical reality is that the only way the shuttle service can continue in 2026 is through some form of cooperation between LTD and Pronto.

Our intent is not to displace LTD's role in serving the event, but rather to find a structure that allows the service to continue while respecting the operational and regulatory constraints we are all navigating.

The buses and equipment we have discussed leasing are public assets entrusted to LTD for the purpose of serving the community. Ensuring that the Oregon Country Fair shuttle service continues would directly advance that shared public mission.

From a practical standpoint, a cooperative structure between LTD and Pronto could allow:

- Continuity of shuttle service for OCF attendees and the Veneta community
- Continued involvement of LTD vehicles, drivers, and supervisory staff
- A structure under which Pronto administers the charter service while working collaboratively with LTD

In many respects, the operation would look very similar to the service LTD has successfully provided for many years under your agreement with OCF, except that it would now operate within a cooperative framework between our organizations.

I also want to point out that Pronto also maintains its own insurance coverage and risk management policies as per the Federal DOT / FMCSA guidelines and mandatory coverage requirements, which would provide an additional layer of protection alongside LTD's existing coverage. When working directly with OCF, you / LTD did not have the benefit or the protection of this additional layer of coverage.

To be clear, we are not asking LTD to reconsider its regulatory determination in this message. Rather, we want to work collaboratively with you to develop a practical and compliant structure that allows the shuttle service to continue while respecting LTD's regulatory responsibilities and while ensuring LTD's continued involvement in the delivery of the services.

For the sake of the Oregon Country Fair organization, the Veneta community, and the tens of thousands of attendees who rely on this transportation service each year, let's work together to create such a structure, which has already been envisioned and codified in FTA Charter Rule 604.8. We know FTA, the regional administrator, and the Charter Ombudsman would welcome and bless this private-public cooperation for the benefit of the public.

We'd like to schedule a conversation with the key stakeholders on both sides at the earliest, so together we can then share with OCF / Kirsten and the community the details of this structure. Please suggest a couple of time options tomorrow – Friday, 03/06 – for this conversation.

Respectfully,
Kumar Shah
President & CEO
Accelar, Inc. dba Pronto Journeys



From: Kumar Shah
Sent: Tuesday, March 3, 2026 2:02 PM
To: Dave Roth <Dave.Roth@ltd.org>
Cc: Heather Lindsay <Heather.Lindsay@ltd.org>; Bret Smith <Bret.Smith@ltd.org>; Eric Breitenstein <Eric.Breitenstein@ltd.org>; Pronto Journeys <cs@prontojourneys.com>
Subject: Clarification Request – § 604.8 Leasing Determination
Importance: High

Dear Dave,
Thank you for your response.

To ensure clarity and a complete understanding of LTD's position, we respectfully request identification of the specific requirement under 49 C.F.R. § 604.8 that LTD believes Pronto Journeys does not satisfy.

§ 604.8 Leasing FTA funded equipment and drivers.

(a) A recipient may lease its FTA-funded equipment and drivers to registered charter providers for charter service only if the following conditions exist:

- (1) The private charter operator is registered on the FTA charter registration website;
- (2) The registered charter provider owns and operates buses or vans in a charter service business;
- (3) The registered charter provider received a request for charter service that exceeds its available capacity either of the number of vehicles operated by the registered charter provider or the number of accessible vehicles operated by the registered charter provider; and
- (4) The registered charter provider has exhausted all of the available vehicles of all registered charter providers in the recipient's geographic service area.

We meet all the requirements of § 604.8 (a):

- (1) Pronto Journeys is registered on the FTA charter registration website;
- (2) Pronto Journeys owns and operates buses in a charter service business;
- (3) Pronto Journeys has received a charter request that exceeds its available capacity;
- (4) Pronto Journeys has exhausted available vehicles from registered charter providers within the geographic service area.

We appreciate your clarification.

Sincerely,
Kumar



From: Dave Roth <Dave.Roth@ltd.org>

Sent: Tuesday, March 3, 2026 11:23 AM

To: Kumar Shah <kumar@prontojourneys.com>; Pronto Journeys <cs@prontojourneys.com>

Cc: Heather Lindsay <Heather.Lindsay@ltd.org>; Bret Smith <Bret.Smith@ltd.org>; Eric Breitenstein <Eric.Breitenstein@ltd.org>

Subject: RE: Formal Request for Vehicles, Operators, and Staff Leasing – Oregon Country Fair 2026 - Kindly respond by Friday, 03-06-2026

Dear Kumar and Sophia,

Thank you for your correspondence and for the information Pronto Journeys has provided in connection with your request to lease LTD vehicles, operators, and supervisory staff for the 2026 Oregon Country Fair shuttle service.

LTD has carefully reviewed your request in light of the applicable federal regulations governing the leasing of FTA-funded equipment and drivers. After review, LTD has determined that the request does not meet the requirements of 49 C.F.R. § 604.8 and must respectfully decline.

We wish Pronto Journeys well in securing an alternative service solution for this event.

Sincerely,

Dave Roth
Planning & Development | Director of Mobility Planning and Policy
P: 541.682.6116
C: 971.258.3581
dave.roth@ltd.org

From: Kumar Shah <kumar@prontojourneys.com>

Sent: Tuesday, March 3, 2026 7:36 AM

To: Bret Smith <Bret.Smith@ltd.org>; Heather Lindsay <Heather.Lindsay@ltd.org>

Cc: Pronto Journeys <cs@prontojourneys.com>

Subject: [External Sender]RE: Formal Request for Vehicles, Operators, and Staff Leasing – Oregon Country Fair 2026 - Kindly respond by Friday, 03-06-2026

Importance: High

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Dear Bret & Heather,

I hope you are well.

I am writing to follow up on our formal request dated 02/26/2026 regarding the leasing of vehicles, operators, and supervisory staff from LTD for the 2026 Oregon Country Fair (OCF) shuttle service.

As you know, planning timelines for this event require clarity in the coming days so that we can finalize service structure and ensure continuity for attendees.

You have indicated that LTD has been operating the shuttle services for OCF for the past 20+ years. You have also indicated that if Pronto Corporation were to back out from providing the shuttle services then LTD will step back in and provide the services. Thank you for confirming availability of vehicles, operators, and supervisory staff to operate the service. Pronto intends to provide the OCF shuttle services and would like to enter into a leasing agreement with LTD for the requisite vehicles, operators, and supervisory staff.

We would appreciate written confirmation from LTD by Friday, March 6th, 2026, of the leasing arrangement pursuant to 49 CFR Part 604.8 for the vehicle quantities previously outlined, and your hourly rates for vehicles / operators, and supervisory staff.

If LTD requires any additional information from us to evaluate this request, please let us know and we will provide it promptly.

We look forward to your response.

Sincerely,

Kumar Shah

President & CEO

Accelar, Inc. dba Pronto Journeys

FTA Charter Registration ID: 6643



From: Kumar Shah
Sent: Thursday, February 26, 2026 3:49 PM
To: Bret Smith <bret.smith@ltd.org>; Heather Lindsay <heather.lindsay@ltd.org>
Cc: Pronto Journeys <cs@prontojourneys.com>
Subject: RE: Formal Request for Vehicles, Operators, and Staff Leasing – Oregon Country Fair 2026
Importance: High

Dear Bret / Heather,

Per my email dated 02-25-2026 – appended below - we responded affirmatively to the 2026 Oregon Country Fair charter posting and has since conducted route validation and detailed operational modeling based on the 2025 hourly ridership data provided by LTD.

After exhausting available private motorcoach options and in light of site-specific constraints communicated by the event organizer, we are formally invoking the leasing provisions under the FTA Charter Service Rule (49 CFR Part 604), which contemplate the leasing of vehicles and/or operators from a recipient agency when necessary to provide the requested charter service.

Based on 2025 peak hourly demand (9:00 AM–3:00 PM and 3:00 PM–9:00 PM windows), and assuming articulated vehicle capacity of approximately 80 passengers per bus, our peak simultaneous vehicle requirements are as follows:

- **Friday (July 10, 2026) – 6 articulated buses**
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Accordingly, Pronto Journeys formally requests that Lane Transit District make available for lease the above-referenced vehicles and corresponding operators for the specified service dates.

For clarity, we are sharing with you a detailed schedule summary - appended as Exhibit A below - reflecting peak half-day vehicle requirements.

Kindly also share with us your 2026 Hourly Rates for your buses and for Supervisory staff.

We appreciate your prompt attention and look forward to your response.

Sincerely,
Kumar Shah
President & CEO

Exhibit A

Oregon Country Fair 2026 – Peak Vehicle Leasing Requirements

(Based on 2025 Hourly Ridership Baseline)

Date	Morning Window (9 AM – 3 PM)	Afternoon Window (3 PM – 9 PM)	Peak Requirement	Vehicle Type
Friday – July 10	4	6	6	60-ft Articulated
Saturday – July 11	5	7	7	60-ft Articulated
Sunday – July 12	4	6	6	60-ft Articulated

Assumptions:

- Peak hourly demand within each half-day window used for sizing
- 80-passenger effective capacity per articulated bus
- Demand-driven provisioning model
- Quantities represent peak simultaneous requirement



From: Pronto Journeys <cs@prontojourneys.com>

Sent: Wednesday, February 25, 2026 3:05 PM

To: Bret Smith <bret.smith@ltd.org>

Cc: Pronto Journeys <cs@prontojourneys.com>; Kumar Shah <kumar@prontojourneys.com>

Subject: Formal Request for Vehicles, Operators, and Staff Leasing – Oregon Country Fair 2026

Importance: High

Dear Bret,
I hope you are well.

As you are aware, Pronto Journeys responded affirmatively to the 2026 Oregon Country Fair charter posting and has since conducted route validation, operational modeling, and fleet sourcing efforts in preparation for service delivery.

After exhausting available private motorcoach options and in light of site-specific constraints communicated by the event organizer, using motorcoaches for OCF is not a viable option because OCF is unwilling to make requisite changes

to make the OCF shuttle route safe for motorcoach travel and for the passengers. At this point, we have exhausted all available private options and we are formally invoking the leasing provisions under the FTA Charter Service Rule (49 CFR Part 604), which contemplate the leasing of vehicles and/or operators from a recipient agency when necessary to provide the requested charter service.

Under [49 CFR Part 604](#), FTA recipients may lease FTA-funded equipment and drivers to registered private charter operators only if the private provider has insufficient capacity (vehicles or accessible vehicles) to meet demand.

Key Aspects of the FTA Charter Leasing Rule (49 CFR 604.8):

- **Capacity Exception:** This is a limited exception used when a registered private charter operator needs additional capacity and cannot fulfill a request on their own.

Accordingly, Pronto Journeys wishes to enter into an agreement with Lane Transit District to lease the vehicles and operators necessary to perform the Oregon Country Fair shuttle service for July 10–12, 2026.

Per your conversation with our company President, Kumar Shah, last week, you confirmed that LTD does have the equipment and drivers available for the OCF shuttle on July 10th, 11th and 12th. We know you have operated the OCF shuttle service for the past 20+ years. We appreciate your and your team's experience and we are looking forward to working with you to make the OCF shuttle service a success. We will also be looking for OCF to provide two (2) on-site supervisors to supervise the operation of the shuttle.

We will provide shortly a detailed breakdown by day outlining:

- Estimated vehicle quantities
- Vehicle types (articulated and/or 40-foot buses)
- Estimated service windows

Our objective is to ensure continuity of service to Oregon Country Fair attendees while remaining fully compliant with the Charter Rule framework.

Kindly share your lease agreement at the earliest convenience.

We appreciate your prompt attention and look forward to your response.

Sincerely,

Sophia

Ops Supervisor

Accelar, Inc. dba Pronto Journeys

FTA Charter Registration ID: 6643



TO: Triennial Reviewers

FROM: Tom Schwetz, Director of Planning & Development (Charter Bus)
Bret Smith, Transit Planner (Charter Bus)

DATE: January 24, 2024

RE: **LTD FY2024 Triennial Review**

16a1. Charter Service Policy and Assessment of Existing LTD Services

LTD adopted a new Charter Service Policy in 2023, which replaces the old 2013 Charter Service ruling. LTD understands the potential findings of how Charter Service is determined and we look forward to speaking further on this matter and learning how we can improve this process.

LTD Service, since the last Triennial:

- **2022 Oregon Country Fair:** July 8-10, 2022 – Non-Charter
- **2023 Oregon Country Fair:** July 7-9, 2023 – Charter
- **2022 Butte to Butte:** July 4, 2022 – Non-Charter
- **2023 Butte to Butte:** July 4, 2023 – Potential Charter
- **World Athletics Championships Oregon 22:** July 15-14, 2022 – Non-Charter

Please see the attached policy and assessment below:



Lane Transit District Charter Service Policy

Transit District has enacted this policy to provide a consistent and easy method to manage Charter Requests, while maintaining compliance with Federal Transit Administration Guidelines. **Compliance with this policy is required for Any and All Charter Services.**

Federal Transit Administration (FTA) Guidelines:

In accordance with Federal regulations, LTD is only allowed to operate charter services as allowed under 49 CFR Part 604, which governs the provision of charter service by recipients of federal funds from FTA. LTD is allowed to operate community-based charter services exempted under the regulations some irregular or limited duration services and those that are covered by the exceptions.

The Federal regulations define charter service as follows:

1. Transportation provided at the request of a third party for the exclusive use of a bus or van for a negotiated price. The following features may be characteristics of charter service:
 - a. A third party pays a negotiated price for the group
 - b. Any fares charged to individual member of the group are collected by a third party
 - c. The service is not part of the regularly scheduled service, or is offered for a limited period of time or
 - d. A third party determines the origin and destination of the trip as well as scheduling or
2. Transportation provided to the public for events or functions that occur on an irregular basis or for a limited duration and:
 - a. A premium fare is charged that is greater than the usual or customary fixed route fare or
 - b. The service is paid for in whole or in part by a third party.

Irregular or Limited Duration Services:

The examples of irregular or limited duration services LTD is allowed to operate under the regulation are as follows:

1. Service that is irregular or on a limited basis for an exclusive group of individuals and provides the service free of charge when a third-party requests service. When LTD initiates service it is allowed so long as LTD does not charge a premium fare for the service and there is no third party paying for the service in whole or in part.
2. Shuttle service for a one-time event if the service is open to the public the itinerary is determined by LTD LTD charges its customary fixed route fare and there is no third-party involvement.
3. When a university pays LTD a fixed charge to allow all faculty, staff, and students to ride the transit system for free. So long as LTD provides the service on a regular basis, along a fixed route, and the service is open to the public.
4. When LTD sees a need and wants to provide service for a limited duration at the customary fixed route fare.

Community-based Charter Services Exceptions:

LTD is allowed to operate community-based charter services under the following exceptions:

1. **Government Officials:** LTD is allowed to provide charter service (up to 80 service hours annually) to government officials (Federal, State and Local) for official government business, which can include non-transit related purposes, if LTD:
 - a. Provides the service in its geographic service area
 - b. Does not generate revenue from the charter service, except as required by law
 - c. Records the following information after providing such service:
 - i. The government organization's name, address, phone number and e-mail address
 - ii. The date and time of service
 - iii. The number of government officials and other passengers
 - iv. The fee collected, if any and
 - v. The vehicle number for the vehicle used to provide the service.

Charter service hours include both time spent transporting passengers and time spent waiting for passengers. Charter service hours also include "deadhead" hours which is time spent getting from the garage to the origin of the trip and then the time spent from trip's ending destination back to the garage.

2. **Qualified Human Service Organization (QHSO):** LTD is allowed to provide charter service to a QHSO for the purpose of serving persons:
 - a. With mobility limitations related to advanced age
 - b. With disabilities or
 - c. With low income.

If the QHSO receives funding, directly or indirectly, from the programs listed in Appendix A of the regulation, the QHSO is not required to register on the FTA's charter registration Web site. Otherwise, the QHSO is required to register.

LTD may provide service only if the QHSO is registered at least 60 days before the date of the first request for charter service.

LTD is required to record the following information after providing such service:

- a. The QHSO's name, address, phone number and e-mail address
 - b. The date and time of service
 - c. The number of passengers
 - d. The origin, destination, and trip length (miles and hours)
 - e. The fee collected, if any and
 - f. The vehicle number for the vehicle used to provide the service.
3. **Leasing of Equipment and Driver:** LTD is allowed to lease its FTA-funded equipment and drivers to registered charter providers for charter service only if the following conditions exist:

- a. The private charter operator is registered on the FTA charter registration Web site
- b. The registered charter provider owns and operates buses or vans in a charter service business
- c. The registered charter provider received a request for charter service that exceeds its available capacity either of the number of vehicles operated or the number of accessible vehicles operated by the registered charter provider and
- d. The registered charter provider has exhausted all of the available vehicles of all registered charter providers in LTD's geographic service area.

LTD is required to record the following information after leasing equipment and drivers

- a. The registered charter provider's name, address, telephone number, and e-mail address
- b. The number of vehicles leased, type of vehicles leased, and vehicle identification numbers and
- c. The documentation provided is the registered charter provider in support of the four conditions discussed above.

4. No Response by Registered Charter Provider LTD is allowed to provide charter service, on its own initiative or at the request of a third party, if no registered charter provider responds to the notice issued
 - a. Within 72 hours for charter service requested to be provided in less than 30 days or
 - b. Within 14 calendar days for charter service requested to be provided in 30 days or more.

LTD is not allowed to provide charter service under this exception if a registered charter provider indicates an interest in providing the charter service described in the notice and the registered charter provider has informed LTD of its interest in providing the service. This is true even if the registered charter provider does not ultimately reach an agreement with the customer.

LTD is required to record the following information after providing the service

- a. The group's name, address, phone number and e-mail address
- b. The date and time of service
- c. The number of passengers
- d. The origin, destination, and trip length (miles and hours)
- e. The fee collected, if any and
- f. The vehicle number for the vehicle used to provide the service.

LTD is required to provide notice to registered charter providers in LTD's geographic service area under this exception. The details of the time frame and contents of the notice are discussed in *Process to Determine Interest from a Private Provider*.

If a registered charter provider indicates interest in providing charter service to a particular customer and fails to negotiate in good faith with the customer, and LTD was willing to provide the service, then LTD can file a complaint against the registered charter provider.

5. Agreement with All Registered Charter Providers LTD is allowed to provide charter service directly to a customer consistent with an agreement entered into with all registered charter providers in LTD's service area. LTD is allowed to provide charter service up to 90 days without an agreement with the newly registered charter provider in the geographic service area subsequent to the initial agreement. Any parties to an agreement may cancel the agreement after providing a 90-day notice to LTD.
6. Petition to the Administrator LTD may petition the Administrator for an exception to the charter service regulations to provide charter service directly to a customer for
 - a. Events of regional or national significance or
 - b. Unique and time sensitive events (e.g., funerals of local, regional or national significance that are in the public's interest.

Process to Determine Interest from a Private Provider:

1. Upon receiving a request for charter service, LTD may
 - a. Decline to provide the service with or without referring the requestor to FTA's charter registration web site www.fta.dot.gov/charterregistration
 - b. Provide the service under an exception discussed above or
 - c. Provide notice to registered charter providers as discussed below.
2. If LTD is interested in providing charter service under the exception "No Response by Registered Charter Provider" discussed above, then upon receipt of a request for charter service, LTD shall provide e-mail notice to registered charter providers in LTD's geographic service area in the following manner
 - a. By the close of business on the day LTD received the request unless the request was received after 2 00 PM in which case the notice shall be sent by the close of business the next business day
 - b. E-mail notice sent to the list of registered charter providers shall include
 - i. Customer name, address, phone number, and e-mail address (if available)
 - i. Requested date of service
 - ii. Approximate number of passengers
 - iii. Type of equipment requested, bus(es) or Van(s)
 - iv. Trip itinerary and approximate duration and
 - v. The intended fare to be charged for the service.
 - c. As a courtesy, LTD will forward the client requesting service the contact information to any interested charter providers. It is the responsibility of the charter provider to contact the potential client to make arrangements.

LTD shall retain an electronic copy of the e-mail notice and the list of registered charter providers that were sent e-mail notice of the requested charter service for a period of at least three years from the date the e-mail notice was sent. If LTD receives an "undeliverable" notice in response to its e-mail notice, LTD

shall send the notice via facsimile. LTD shall maintain the record of the undeliverable e-mail notice and the facsimile sent confirmation for three years.

Additional Charter Service Guidelines:

1. No request for charter service may be approved if it will result in the forced cancellation of operator vacations.
2. No request for charter service may be approved if it will result in a reduction in LTD's general services.
3. If a request for charter service is approved by LTD staff
 - a. A Charter Service Report will be completed by LTD staff. The report shall identify which exception LTD relied upon to provide the service.
 - b. If LTD charges a fee (as allowed under the exceptions) it will not be less than the fully allocated cost and is charged from garage back to garage with a three-hour minimum per bus charge.
 - c. A three-hour minimum deposit is required prior to delivery of service.
 - d. The service area is defined as within Lane County.
 - e. Upon completion of the service, LTD staff will forward a finalized copy of the Charter Service Report form and the completed Invoice Request form to the Accounts Receivable office. The original LTD Charter Service Report will be forwarded to the Purchasing Division. The Special Service order forms will be forwarded to the Statistical Data Manager.
 - f. Details about the service provided are documented on the Charter Service Usage form and include exception, registered charter, provider, date of service, number of days service was provided, the cumulative number of hours service was provided, the cumulative number of buses used to provide the service, the cumulative total miles traveled garage to garage, the cumulative number of passengers carried, and revenues collected for the service provided. Copies will be forwarded to the Director of Planning and Director of Marketing. One copy will remain on file in the Transportation Department.
 - g. If LTD provides charter service under one or more of the exceptions under this regulation it is required to maintain notices and records in an electronic format for a period of at least three years from the date of service or lease. LTD may maintain the required records in other formats in addition to the electronic format.
 - h. If LTD provides charter service under the exceptions, it shall post the required records on the FTA charter web site, through the TEAM system, 30 days after the end of each calendar quarter, as follows
 - i. October 1 to December 31 on January 30th
 - ii. January 1 to March 31 on April 30th
 - iii. April 1 to June 30th on July 30 and
 - iv. July 1 to September 30th October 30.
4. A single document or charter log may include all charter service trips provided during the quarter. LTD may exclude specific origin to destination information for safety and security reasons. If such information is excluded, the record of the service shall describe the reason why such information was excluded and provide generalized information.

5. The Planning Department will keep a record of all FTA advisory opinions and documentation that the FTA advisory opinion was followed. This includes all cease-and-desist orders from FTA. If a cease-and-desist order is rendered, LTD is required to follow it.
6. The Planning Department will be notified of all charter service exceptions and record each on the TEAM system.

Charter Service Rules:

1. Charter Services are granted on a first come – first serve basis and are dependent upon vehicle availability.
 - a. Wheelchair accessible buses are available.
2. Requests must be received no later than 5 business days prior to the proposed reservation date.
3. Service hours are from 6 00a.m. until 12 00a.m. No overnight services are provided.
4. Services can be provided throughout the week excluding the following Holidays
 - a. New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day.
5. Service is limited to a 30-mile radius of the Eugene- Springfield metro area.
6. Number of vehicles required will be determined by LTD staff based on capacity and expected number of passengers.
7. The hourly Charter Service Rate is \$100.00 with a three-hour minimum.
8. Service time will begin 30 minutes prior to departure from the station and 30 minutes after the vehicle has returned to allow for pre and post-service inspections.
9. Possession of hazardous materials or weapons is strictly prohibited.
10. Use of tobacco products or illegal substances is strictly prohibited.
11. No open alcoholic beverages allowed.



AGENDA ITEM SUMMARY

DATE OF MEETING: August 16, 2023

ITEM TITLE: POLICIES: SURPLUS VEHICLES, CHARTER SERVICES, SPONSORSHIPS

PRESENTER: Camille Gandolfi, Chief of Staff

CHIEF OFFICER: Jameson Auten, General Manager/Chief Executive Officer

ACTION REQUESTED: Information and Discussion

PURPOSE: To request adoption of the enclosed policies

DESCRIPTION: Staff have developed the following policies to support consistent and equitable processes related to surplus vehicles, charter services and sponsorships. Staff will be available for any questions

SUPPORTING DOCUMENTATION:

- 1) Surplus Vehicles Policy
- 2) Charter Service Policy
- 3) Sponsorships Policy
- 4) Resolution No. 2023-08-16-039

PROPOSED MOTION: I move adoption of LTD Resolution No. 2023-08-16-039:

It is hereby resolved that the LTD Board of Directors adopts the Surplus Vehicles, Charter Services, and Sponsorships Policies as presented [amended].



RESOLUTION NO. 2023-08-16-039

ADOPTION OF LTD CHARTER SERVICES POLICY; SURPLUS VEHICLE POLICY; SPONSORSHIP POLICY

WHEREAS, the Lane Transit District ("District") Board of Directors ("Board") may create bylaws and policies and do such other acts or things as may be necessary or convenient for the proper exercise of powers granted to them as the governance of a mass transit district;

WHEREAS, staff have established a Policy providing procedures charter services that is in compliance with Federal Transit Administration guidelines;

WHEREAS, staff have established a Policy providing procedures surplus vehicles that is in compliance with state and federal regulation;

WHEREAS, staff have established a Policy providing procedures District sponsorships that is aligned with District Mission, Vision, Values and agency goals;

WHEREAS, LTD shall make these policies available to all LTD employees and members of the LTD Board of Directors; and,

NOW, THEREFORE, BE IT RESOLVED that the Lane Transit District Board of Directors passes a Resolution adopting the:

- Surplus Vehicles Policy
- Charter Services Policy
- Sponsorship Policy

ADOPTED BY THE LANE TRANSIT DISTRICT BOARD OF DIRECTORS ON THIS 16TH DAY OF AUGUST, 2023.

Gino Grimaldi

Gino Grimaldi (Aug 24, 2023 07:46 PDT)

Board President, Gino Grimaldi

FTA Regulatory Language on Charter Service – Assessment of Existing of LTD Services

Note that **Green Highlights** mean the language describes a condition that exists (non-compliant) and **Red font** means the condition does not exist (and is therefore compliant).

Oregon Country Fair

"Charter service" is defined at 49 CFR Section 604.3(c) as follows:

"Charter service" means, but does not include demand response service to individuals:

(I) Transportation provided by a recipient at the request of a **third party for the exclusive use of a bus or van for a negotiated price**. The following features may be characteristic of charter service:

(i) **A third party pays the transit provider a negotiated price for the group;**

(ii) **Any fares charged to individual members of the group are collected by a third party;** *(Note OCF rolls the cost of a two-way fare into the cost of a ticket to the event – this sets up a problem for non-fair goers to use the service)*

(iii) **The service is not part of the transit provider's regularly scheduled service, or is offered for a limited period of time;** or

(iv) **A third party determines the origin and destination of the trip as well as scheduling;** or

(2) **Transportation provided by a recipient to the public for events or functions that occur on an irregular basis or for a limited duration and:**

(i) A premium fare is charged that is greater than the usual or customary fixed route fare; or

(ii) **The service is paid for in whole or in part by a third party.**

Assessment – Non-Compliant: Key elements of the current operation of this service that have changed from when we had approval include limiting the service to fair goers (no public); and routing the service in a manner that is not a minor deviation from the 93 route currently operating to Veneta. The routing issue is addressed by including the route as part of the summer bid, but limiting the people who can ride to fair goers only (with OCF security managing who can get aboard our buses) is non-compliant. Options for compliant service would include both designating the route as a regular route during the summer bid and removing restrictions for general public use of the service. Options for this might include ...

79X

"Charter service" is defined at 49 CFR Section 604.3(c) as follows:

"Charter service" means, but does not include demand response service to individuals:

(1) Transportation provided by a recipient at the request of a third party **for the exclusive use of a bus or van for a negotiated price**. The following features may be characteristic of charter service:

(i) A third party pays the transit provider a negotiated price **for the group;**

(ii) Any fares charged to individual members of the group are **collected by a third party;**

(iii) **The service is not part of the transit provider's regularly scheduled service, or is offered for a limited period of time;** or

(iv) **A third party determines the origin and destination of the trip as well as**

scheduling; or

(2) Transportation provided by a recipient to the public for events or functions that occur on an irregular basis or for a limited duration and:

(i) A premium fare is charged that is greater than the usual or customary fixed route fare; or

(ii) *The service is paid for in whole or in part by a third party.*

Assessment – Compliant: Key aspects of this determination include those clauses in red text. basically, the ASUO is paying for extra service on an existing route with no strings attached (for example, the service is not limited to UO students nor does the ASUO determine the origin and destination of the service).

UO Football Service

"Charter service" is defined at 49 CFR Section 604.3(c) as follows:

"Charter service" means, but does not include demand response service to individuals:

(1) Transportation provided by a recipient at the request of a third party for the exclusive use of a bus or van for a negotiated price. The following features may be characteristic of charter service:

(i) A third party pays the transit provider a negotiated price for the group;

(ii) Any fares charged to individual members of the group are collected by a third party;

(iii) The service is not part of the transit provider's regularly scheduled service, or is offered for a limited period of time; or

(iv) A third party determines the origin and destination of the trip as well as scheduling; or

(2) Transportation provided by a recipient to the public for events or functions that occur on an irregular basis or for a limited duration and:

(i) A premium fare is charged that is greater than the usual or customary fixed route fare; or

(ii) The service is paid for in whole or in part by a third party.

Assessment – Non-Compliant: Similar to OCF service, UO football service is paid for by a third-party (UO). In addition, the services provided for limited duration (typically seven games per season), and a premium fare is charged.

Butte to Butte

"Charter service" is defined at 49 CFR Section 604.3(c) as follows:

"Charter service" means, but does not include demand response service to individuals:

(1) Transportation provided by a recipient at the request of a third party for the exclusive use of a bus or van for a negotiated price. The following features may be characteristic of charter service:

(i) A third party pays the transit provider a negotiated price for the group;

(ii) Any fares charged to individual members of the group are collected by a third party;

(iii) The service is not part of the transit provider's regularly scheduled service, or is offered for a limited period of time; or

- (iv) A third party determines the origin and destination of the trip as well as scheduling; or
- (2) Transportation provided by a recipient to the public for events or functions that occur on an irregular basis or for a limited duration and:
 - (i) A premium fare is charged that is greater than the usual or customary fixed route fare; or
 - (ii) The service is paid for in whole or in part by a third party.

Assessment – Compliant: None of the indicators of charter service are present.



TO: Triennial Reviewers

FROM: Tom Schwetz, Director of Planning & Development (Charter Bus)
Bret Smith, Transit Planner (Charter Bus)

DATE: January 24, 2024

RE: **LTD FY2024 Triennial Review**

16a1. Charter Service Policy and Assessment of Existing LTD Services

LTD adopted a new Charter Service Policy in 2023, which replaces the old 2013 Charter Service ruling. LTD understands the potential findings of how Charter Service is determined and we look forward to speaking further on this matter and learning how we can improve this process.

LTD Service, since the last Triennial:

- **2022 Oregon Country Fair:** July 8-10, 2022 – Non-Charter
- **2023 Oregon Country Fair:** July 7-9, 2023 – Charter
- **2022 Butte to Butte:** July 4, 2022 – Non-Charter
- **2023 Butte to Butte:** July 4, 2023 – Potential Charter
- **World Athletics Championships Oregon 22:** July 15-14, 2022 – Non-Charter

Please see the attached policy and assessment below:



Lane Transit District Charter Service Policy

Transit District has enacted this policy to provide a consistent and easy method to manage Charter Requests, while maintaining compliance with Federal Transit Administration Guidelines. **Compliance with this policy is required for Any and All Charter Services.**

Federal Transit Administration (FTA) Guidelines:

In accordance with Federal regulations, LTD is only allowed to operate charter services as allowed under 49 CFR Part 604, which governs the provision of charter service by recipients of federal funds from FTA. LTD is allowed to operate community-based charter services exempted under the regulations; some irregular or limited duration services; and those that are covered by the exceptions.

The Federal regulations define charter service as follows:

1. Transportation provided at the request of a third party for the exclusive use of a bus or van for a negotiated price. The following features may be characteristics of charter service:
 - a. A third party pays a negotiated price for the group;
 - b. Any fares charged to individual member of the group are collected by a third party;
 - c. The service is not part of the regularly scheduled service, or is offered for a limited period of time; or
 - d. A third party determines the origin and destination of the trip as well as scheduling; **or**
2. Transportation provided to the public for events or functions that occur on an irregular basis or for a limited duration and:
 - a. A premium fare is charged that is greater than the usual or customary fixed route fare; or
 - b. The service is paid for in whole or in part by a third party.

Irregular or Limited Duration Services:

The examples of irregular or limited duration services LTD is allowed to operate under the regulation are as follows:

1. Service that is irregular or on a limited basis for an exclusive group of individuals and provides the service free of charge when a third-party requests service. When LTD initiates service it is allowed so long as LTD does not charge a premium fare for the service and there is no third party paying for the service in whole or in part.
2. Shuttle service for a one-time event if the service is open to the public; the itinerary is determined by LTD; LTD charges its customary fixed route fare; and there is no third-party involvement.
3. When a university pays LTD a fixed charge to allow all faculty, staff, and students to ride the transit system for free. So long as LTD provides the service on a regular basis, along a fixed route, and the service is open to the public.
4. When LTD sees a need and wants to provide service for a limited duration at the customary fixed route fare.

Community-based Charter Services Exceptions:

LTD is allowed to operate community-based charter services under the following exceptions:

1. Government Officials: LTD is allowed to provide charter service (up to 80 service hours annually) to government officials (Federal, State and Local) for official government business, which can include non-transit related purposes, if LTD:
 - a. Provides the service in its geographic service area;
 - b. Does not generate revenue from the charter service, except as required by law;
 - c. Records the following information after providing such service:
 - i. The government organization's name, address, phone number and e-mail address;
 - ii. The date and time of service;
 - iii. The number of government officials and other passengers;
 - iv. The fee collected, if any; and
 - v. The vehicle number for the vehicle used to provide the service.

Charter service hours include both time spent transporting passengers and time spent waiting for passengers. Charter service hours also include "deadhead" hours which is time spent getting from the garage to the origin of the trip and then the time spent from trip's ending destination back to the garage.

2. Qualified Human Service Organization (QHSO): LTD is allowed to provide charter service to a QHSO for the purpose of serving persons:
 - a. With mobility limitations related to advanced age;
 - b. With disabilities; or
 - c. With low income.

If the QHSO receives funding, directly or indirectly, from the programs listed in Appendix A of the regulation, the QHSO is not required to register on the FTA's charter registration Web site. Otherwise, the QHSO is required to register.

LTD may provide service only if the QHSO is registered at least 60 days before the date of the first request for charter service.

LTD is required to record the following information after providing such service:

- a. The QHSO's name, address, phone number and e-mail address;
 - b. The date and time of service;
 - c. The number of passengers;
 - d. The origin, destination, and trip length (miles and hours);
 - e. The fee collected, if any; and
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3. Leasing of Equipment and Driver: LTD is allowed to lease its FTA-funded equipment and drivers to registered charter providers for charter service only if the following conditions exist:

- a. The private charter operator is registered on the FTA charter registration Web site;
- b. The registered charter provider owns and operates buses or vans in a charter service business;
- c. The registered charter provider received a request for charter service that exceeds its available capacity either of the number of vehicles operated or the number of accessible vehicles operated by the registered charter provider; and
- d. The registered charter provider has exhausted all of the available vehicles of all registered charter providers in LTD's geographic service area.

LTD is required to record the following information after leasing equipment and drivers:

- a. The registered charter provider's name, address, telephone number, and e-mail address;
- b. The number of vehicles leased, type of vehicles leased, and vehicle identification numbers; and
- c. The documentation provided is the registered charter provider in support of the four conditions discussed above.

4. No Response by Registered Charter Provider: LTD is allowed to provide charter service, on its own initiative or at the request of a third party, if no registered charter provider responds to the notice issued:
 - a. Within 72 hours for charter service requested to be provided in less than 30 days; or
 - b. Within 14 calendar days for charter service requested to be provided in 30 days or more.

LTD is not allowed to provide charter service under this exception if a registered charter provider indicates an interest in providing the charter service described in the notice and the registered charter provider has informed LTD of its interest in providing the service. This is true even if the registered charter provider does not ultimately reach an agreement with the customer.

LTD is required to record the following information after providing the service:

- a. The group's name, address, phone number and e-mail address;
- b. The date and time of service;
- c. The number of passengers;
- d. The origin, destination, and trip length (miles and hours);
- e. The fee collected, if any; and
- f. The vehicle number for the vehicle used to provide the service.

LTD is required to provide notice to registered charter providers in LTD's geographic service area under this exception. The details of the time frame and contents of the notice are discussed in *Process to Determine Interest from a Private Provider*.

If a registered charter provider indicates interest in providing charter service to a particular customer and fails to negotiate in good faith with the customer, and LTD was willing to provide the service, then LTD can file a complaint against the registered charter provider.

5. Agreement with All Registered Charter Providers: LTD is allowed to provide charter service directly to a customer consistent with an agreement entered into with all registered charter providers in LTD's service area. LTD is allowed to provide charter service up to 90 days without an agreement with the newly registered charter provider in the geographic service area subsequent to the initial agreement. Any parties to an agreement may cancel the agreement after providing a 90-day notice to LTD.
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Process to Determine Interest from a Private Provider:

1. Upon receiving a request for charter service, LTD may:
 - a. Decline to provide the service with or without referring the requestor to FTA's charter registration web site; www.fta.dot.gov/charterregistration
 - b. Provide the service under an exception discussed above; or
 - c. Provide notice to registered charter providers as discussed below.
2. If LTD is interested in providing charter service under the exception "No Response by Registered Charter Provider" discussed above, then upon receipt of a request for charter service, LTD shall provide e-mail notice to registered charter providers in LTD's geographic service area in the following manner:
 - a. By the close of business on the day LTD received the request unless the request was received after 2:00 PM; in which case the notice shall be sent by the close of business the next business day;
 - b. E-mail notice sent to the list of registered charter providers shall include:
 - i. Customer name, address, phone number, and e-mail address (if available);
 - i. Requested date of service;
 - ii. Approximate number of passengers;
 - iii. Type of equipment requested, bus(es) or Van(s);
 - iv. Trip itinerary and approximate duration; and
 - v. The intended fare to be charged for the service.
 - c. As a courtesy, LTD will forward the client requesting service the contact information to any interested charter providers. It is the responsibility of the charter provider to contact the potential client to make arrangements.

LTD shall retain an electronic copy of the e-mail notice and the list of registered charter providers that were sent e-mail notice of the requested charter service for a period of at least three years from the date the e-mail notice was sent. If LTD receives an "undeliverable" notice in response to its e-mail notice, LTD

shall send the notice via facsimile. LTD shall maintain the record of the undeliverable e-mail notice and the facsimile sent confirmation for three years.

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2. No request for charter service may be approved if it will result in a reduction in LTD's general services.
3. If a request for charter service is approved by LTD staff:
 - a. A Charter Service Report will be completed by LTD staff. The report shall identify which exception LTD relied upon to provide the service.
 - b. If LTD charges a fee (as allowed under the exceptions) it will not be less than the fully allocated cost and is charged from garage back to garage with a three-hour minimum per bus charge.
 - c. A three-hour minimum deposit is required prior to delivery of service.
 - d. The service area is defined as within Lane County.
 - e. Upon completion of the service, LTD staff will forward a finalized copy of the Charter Service Report form and the completed Invoice Request form to the Accounts Receivable office. The original LTD Charter Service Report will be forwarded to the Purchasing Division. The Special Service order forms will be forwarded to the Statistical Data Manager.
 - f. Details about the service provided are documented on the Charter Service Usage form and include: exception, registered charter, provider, date of service, number of days service was provided, the cumulative number of hours service was provided, the cumulative number of buses used to provide the service, the cumulative total miles traveled garage to garage, the cumulative number of passengers carried, and revenues collected for the service provided. Copies will be forwarded to the Director of Planning and Director of Marketing. One copy will remain on file in the Transportation Department.
 - g. If LTD provides charter service under one or more of the exceptions under this regulation it is required to maintain notices and records in an electronic format for a period of at least three years from the date of service or lease. LTD may maintain the required records in other formats in addition to the electronic format.
 - h. If LTD provides charter service under the exceptions, it shall post the required records on the FTA charter web site, through the TEAM system, 30 days after the end of each calendar quarter, as follows:
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Charter Service Rules:

1. Charter Services are granted on a first come – first serve basis and are dependent upon vehicle availability.
 - a. Wheelchair accessible buses are available.
2. Requests must be received no later than 5 business days prior to the proposed reservation date.
3. Service hours are from 6:00a.m until 12:00a.m. No overnight services are provided.
4. Services can be provided throughout the week excluding the following Holidays:
 - a. New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day.
5. Service is limited to a 30-mile radius of the Eugene- Springfield metro area.
6. Number of vehicles required will be determined by LTD staff based on capacity and expected number of passengers.
7. The hourly Charter Service Rate is \$100.00 with a three-hour minimum.
8. Service time will begin 30 minutes prior to departure from the station and 30 minutes after the vehicle has returned to allow for pre and post-service inspections.
9. Possession of hazardous materials or weapons is strictly prohibited.
10. Use of tobacco products or illegal substances is strictly prohibited.
11. No open alcoholic beverages allowed.



AGENDA ITEM SUMMARY

DATE OF MEETING: August 16, 2023

ITEM TITLE: POLICIES: SURPLUS VEHICLES, CHARTER SERVICES, SPONSORSHIPS

PRESENTER: Camille Gandolfi, Chief of Staff

CHIEF OFFICER: Jameson Auten, General Manager/Chief Executive Officer

ACTION REQUESTED: Information and Discussion

PURPOSE: To request adoption of the enclosed policies

DESCRIPTION: Staff have developed the following policies to support consistent and equitable processes related to surplus vehicles, charter services and sponsorships. Staff will be available for any questions

SUPPORTING DOCUMENTATION:

- 1) Surplus Vehicles Policy
- 2) Charter Service Policy
- 3) Sponsorships Policy
- 4) Resolution No. 2023-08-16-039

PROPOSED MOTION: I move adoption of LTD Resolution No. 2023-08-16-039:

It is hereby resolved that the LTD Board of Directors adopts the Surplus Vehicles, Charter Services, and Sponsorships Policies as presented [amended].



RESOLUTION NO. 2023-08-16-039

ADOPTION OF LTD CHARTER SERVICES POLICY; SURPLUS VEHICLE POLICY; SPONSORSHIP POLICY

WHEREAS, the Lane Transit District ("District") Board of Directors ("Board") may create bylaws and policies and do such other acts or things as may be necessary or convenient for the proper exercise of powers granted to them as the governance of a mass transit district;

WHEREAS, staff have established a Policy providing procedures charter services that is in compliance with Federal Transit Administration guidelines;

WHEREAS, staff have established a Policy providing procedures surplus vehicles that is in compliance with state and federal regulation;

WHEREAS, staff have established a Policy providing procedures District sponsorships that is in aligned with District Mission, Vision, Values and agency goals;

WHEREAS, LTD shall make these policies available to all LTD employees and members of the LTD Board of Directors; and,

NOW, THEREFORE, BE IT RESOLVED that the Lane Transit District Board of Directors passes a Resolution adopting the:

- Surplus Vehicles Policy
- Charter Services Policy
- Sponsorship Policy

ADOPTED BY THE LANE TRANSIT DISTRICT BOARD OF DIRECTORS ON THIS 16TH DAY OF AUGUST, 2023.

Gino Grimaldi
Gino Grimaldi (Aug 24, 2023 07:48 PDT)
Board President, Gino Grimaldi

FTA Regulatory Language on Charter Service – Assessment of Existing of LTD Services

Note that **Green Highlights** mean the language describes a condition that exists (non-compliant) and **Red font** means the condition does not exist (and is therefore compliant).

Oregon Country Fair

"Charter service" is defined at 49 CFR Section 604.3(c) as follows:

"Charter service" means, but does not include demand response service to individuals:

- (I) Transportation provided by a recipient at the request of a **third party for the exclusive use of a bus or van for a negotiated price**. The following features may be characteristic of charter service:
- (i) **A third party pays the transit provider a negotiated price for the group;**
 - (ii) **Any fares charged to individual members of the group are collected by a third party;** *(Note OCF rolls the cost of a two-way fare into the cost of a ticket to the event – this sets up a problem for non-fair goers to use the service)*
 - (iii) **The service is not part of the transit provider's regularly scheduled service, or is offered for a limited period of time;** or
 - (iv) **A third party determines the origin and destination of the trip as well as scheduling; or**
- (2) **Transportation provided by a recipient to the public for events or functions that occur on an irregular basis or for a limited duration and:**
- (i) A premium fare is charged that is greater than the usual or customary fixed route fare; or
 - (ii) **The service is paid for in whole or in part by a third party.**

Assessment – Non-Compliant: Key elements of the current operation of this service that have changed from when we had approval include limiting the service to fair goers (no public); and routing the service in a manner that is not a minor deviation from the 93 route currently operating to Veneta. The routing issue is addressed by including the route as part of the summer bid, but limiting the people who can ride to fair goers only (with OCF security managing who can get aboard our buses) is non-compliant. Options for compliant service would include both designating the route as a regular route during the summer bid and removing restrictions for general public use of the service. Options for this might include ...

79X

"Charter service" is defined at 49 CFR Section 604.3(c) as follows:

"Charter service" means, but does not include demand response service to individuals:

- (1) Transportation provided by a recipient at the request of a third party **for the exclusive use** of a bus or van for a negotiated price. The following features may be characteristic of charter service:
- (i) A third party pays the transit provider a negotiated price **for the group;**
 - (ii) Any fares charged to individual members of the group are **collected by a third party;**
 - (iii) **The service is not part of the transit provider's regularly scheduled service, or is offered for a limited period of time;** or
 - (iv) **A third party determines the origin and destination of the trip as well as**

scheduling; or

(2) Transportation provided by a recipient to the public for events or functions that occur on an irregular basis or for a limited duration and:

(i) A premium fare is charged that is greater than the usual or customary fixed route fare; or

(ii) *The service is paid for in whole or in part by a third party.*

Assessment – Compliant: Key aspects of this determination include those clauses in red text. basically, the ASUO is paying for extra service on an existing route with no strings attached (for example, the service is not limited to UO students nor does the ASUO determine the origin and destination of the service).

UO Football Service

"Charter service" is defined at 49 CFR Section 604.3(c) as follows:

"Charter service" means, but does not include demand response service to individuals:

(1) Transportation provided by a recipient at the request of a third party for the exclusive use of a bus or van for a negotiated price. The following features may be characteristic of charter service:

(i) A third party pays the transit provider a negotiated price for the group;

(ii) Any fares charged to individual members of the group are collected by a third party;

(iii) The service is not part of the transit provider's regularly scheduled service, or is offered for a limited period of time; or

(iv) A third party determines the origin and destination of the trip as well as scheduling; or

(2) Transportation provided by a recipient to the public for events or functions that occur on an irregular basis or for a limited duration and:

(i) A premium fare is charged that is greater than the usual or customary fixed route fare; or

(ii) The service is paid for in whole or in part by a third party.

Assessment – Non-Compliant: Similar to OCF service, UO football service is paid for by a third-party (UO). In addition, the services provided for limited duration (typically seven games per season), and a premium fare is charged.

Butte to Butte

"Charter service" is defined at 49 CFR Section 604.3(c) as follows:

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(1) Transportation provided by a recipient at the request of a third party for the exclusive use of a bus or van for a negotiated price. The following features may be characteristic of charter service:

(i) A third party pays the transit provider a negotiated price for the group;

(ii) Any fares charged to individual members of the group are collected by a third party;

(iii) The service is not part of the transit provider's regularly scheduled service, or is offered for a limited period of time; or

- (iv) A third party determines the origin and destination of the trip as well as scheduling; or
- (2) Transportation provided by a recipient to the public for events or functions that occur on an irregular basis or for a limited duration and:
 - (i) A premium fare is charged that is greater than the usual or customary fixed route fare; or
 - (ii) The service is paid for in whole or in part by a third party.

Assessment – Compliant: None of the indicators of charter service are present.

kumar accelar.com

From: kumar accelar.com
Sent: Friday, December 26, 2025 9:06 AM
To: bolton@oregoncountryfair.org
Cc: Customer Service
Subject: FW: 2026 Oregon Country Fair charter posting
Attachments: 2026 Oregon Country Fair Charter posting.pdf

Importance: High

Tracking:	Recipient	Delivery
	bolton@oregoncountryfair.org	
	Customer Service	Delivered: 12/26/2025 9:06 AM

Dear Kristen,

I am writing on behalf of **Pronto Journeys**, a **registered private charter transportation provider (FTA Charter Registration ID: 6643)**, regarding shuttle transportation services for the **2026 Oregon Country Fair**, scheduled for **July 10–12, 2026**.

Lane Transit District recently issued a charter service notice under **49 CFR Part 604.14**, seeking to determine whether any registered private charter providers were willing and able to provide shuttle service between designated park-and-ride locations and the fair venue. Pronto has **formally responded confirming that we are willing and able to provide the full scope of services described** in that notice.

Under the **Federal Transit Administration’s Charter Service Rule**, when a registered private charter provider affirms its willingness and ability to provide the service, a public transit agency such as Lane Transit District **may not directly provide the charter service**. In such circumstances, the service must be provided by a private charter operator.

Who We Are: Pronto Journeys

Pronto Journeys brings more than **20 years of continuous operating history** delivering charter, shuttle, and special-event transportation across the United States. Over that period, Pronto and its affiliates have:

- Operated **60K+ charter trips**
- Transported **2.5M+** across school, university, corporate, sports, and public events
- Built a nationwide affiliate network of **6,700+ licensed, insured charter operators**
- Supported **large, multi-day, high-frequency events** requiring ADA accessibility, precise scheduling, and complex site logistics

Our experience includes **major professional sports and special-event shuttle operations**, including long-running shuttle programs supporting **NFL games and large events at Levi’s Stadium, 49ers home games under a 4-year contract with San Francisco 49ers**, as well as college athletics, festivals, conventions, and civic events.

Safety and compliance are foundational to our operations. We work exclusively with operators that meet strict licensing, insurance, and safety requirements, and we maintain a strong operational safety record across our network.

What Makes Pronto Different: Our Click-and-Mortar Model:

Pronto operates a “**click-and-mortar**” **transportation model**, combining:

- **On-the-ground operational expertise** (fleet sourcing, dispatch, ground crews, site management), and
- A **modern, cloud-based booking and operations platform** purpose-built for group and event transportation

This hybrid / integrated approach allows Pronto to deliver the reliability of a traditional operator with the scalability, transparency, and efficiency of a technology platform.

Our Cloud-Based Platform — “Uber for Groups”

Pronto’s online, cloud-based booking portal is often described as “**Uber for Groups**”. It provides:

- Centralized trip planning, booking, and dispatch
- Real-time visibility into fleet deployment and capacity
- Automated coordination across multiple operators and vehicle types
- Transparent pricing and service specifications
- A single system of record for planning, operations, and reporting

For events like the Oregon Country Fair, this means **better planning, fewer surprises, and real-time operational control** throughout the event.

What OCF Will Experience with Pronto (vs. Traditional Transit)

While remaining fully compliant with all federal charter service requirements, Pronto delivers a purpose-built event transportation model that differs materially from traditional public transit operations:

- **Single point of accountability** — one entity responsible for planning, execution, safety, and performance
- **Event-specific service design**, tailored to attendance patterns rather than fixed-route assumptions
- **Dedicated ADA-accessible fleet planning**, not shared with daily route service
- **On-site ground operations teams** managing loading, unloading, queue flow, and accessibility assistance
- **Real-time command and control**, enabling rapid response to demand surges, weather, or disruptions
- **Direct coordination with event staff, traffic control, and local authorities**
- A **clear, guest-friendly rider experience**, including wayfinding, signage, staffing, and communications

Capacity Resiliency & Coordination with LTD

To ensure service continuity under all conditions, Pronto’s operating plan allows that **in the unlikely event aggregate private charter capacity is fully utilized**, Pronto may **supplement capacity by leasing buses and/or drivers from Lane Transit District**, under **Pronto’s operational direction and control**. Any such supplemental arrangements would remain fully compliant with **FTA charter service requirements**, with Pronto serving as the charter service provider of record.

We welcome the opportunity to coordinate directly with Oregon Country Fair staff and schedule an online Zoom session to discuss service planning, logistics, and next steps, and to tailor the shuttle operation to OCF's unique site conditions, sustainability goals, and attendee experience.

Thank you for your time and for your commitment to providing safe, accessible, and environmentally responsible transportation options for fairgoers.

Warm regards,
Kumar Shah

Kumar Shah
President & CEO
Accelar, Inc. dba Pronto Journeys
84 W Santa Clara St
Suite 700
San Jose, CA 95113
kumar@accelar.com
650.249.7418 (w)
408.472.5662 (mobile)

From: Bret Smith <Bret.Smith@ltd.org>
Sent: Wednesday, December 24, 2025 10:40 AM
To: Bret Smith <Bret.Smith@ltd.org>
Subject: 2026 Oregon Country Fair charter posting

In compliance with FTA rules 49 CFR Ch. VI 604.14 Lane Transit District is providing notice to registered private charter providers on behalf of the Oregon Country Fair (OCF). Lane Transit District is reaching out to registered private charter providers to determine interest to provide charter shuttle service between the park and ride and the event venue.

Lane Transit District has interest in providing this service if there are no registered charter providers who show interest to provide this service.

Thank you,

Bret Smith
Lane Transit District
Senior Service Planner
P:541-682-6191 | F: 541- 682-6111
Contact us at ltd.org



Customer Service

From: kbolton@oregoncountryfair.org
Sent: Tuesday, December 30, 2025 11:40 AM
To: 'Bret Smith'; kumar accelar.com
Cc: Customer Service
Subject: RE: [External Sender]Confirmation of Pronto Availability - Charter Service (49 CFR Part 604.14)

Hi Bret,

I called and left Kumar a voicemail and sent an email this morning. I will report back once we have had a conversation.

Happy New Year!

Kirsten Bolton
Executive Director
Oregon Country Fair
442 Lawrence St.
Cell#541-321-6626
Office#541-343-4298



From: Bret Smith
Sent: Monday, December 29, 2025 1:32 PM
To: kumar accelar.com
Cc: Customer Service ; kbolton@oregoncountryfair.org
Subject: RE: [External Sender]Confirmation of Pronto Availability – Charter Service (49 CFR Part 604.14)

Dear Kumar,

Thank you for your detailed response to Lane Transit District's charter service notice dated December 24, 2025, regarding shuttle service for the 2026 Oregon Country Fair. We acknowledge Pronto Journeys' confirmation that it is a registered private charter transportation provider and that it is willing and able to provide the full scope of services described in the notice.

Consistent with 49 CFR Part 604 and based on your affirmative response, Lane Transit District understands that it would not directly provide charter service for this event, as a willing and able registered private charter provider has come forward.

For coordination purposes, the primary contact for the Oregon Country Fair is:

Kirsten Bolton
Oregon Country Fair
Email: kbolton@oregoncountryfair.org
Phone: 541-343-4298

Please note that Lane Transit District requests to be notified as soon as possible if Accelar, Inc. dba Pronto Journeys withdraws its interest or is unable to provide the charter service described. Timely notice is essential to allow for compliance with federal requirements and to ensure adequate transportation planning for the event.

If additional information or documentation is required please reach out to Kirsten Bolton from Oregon Country fair.

Sincerely,

Bret Smith
Lane Transit District
Senior Service Planner
P:541-682-6191 | F: 541- 682-6111
Contact us at ltd.org



From: kumar accelar.com <kumar@accelar.com>
Sent: Friday, December 26, 2025 8:47 AM
To: Bret Smith <Bret.Smith@ltd.org>
Cc: Customer Service <CS@accelar.com>
Subject: [External Sender]Confirmation of Pronto Availability – Charter Service (49 CFR Part 604.14)

You don't often get email from kumar@accelar.com. [Learn why this is important](#)

Dear Bret,

Thank you for Lane Transit District's charter service notice dated December 24, 2025, issued pursuant to **49 CFR Part 604.14**, regarding shuttle service for the **2026 Oregon Country Fair**.

This letter serves as Pronto Journeys' **formal confirmation for the record** that we are a **registered private charter transportation provider (FTA Charter Registration ID: 6643)** and are **willing and able to provide the full scope of charter shuttle services** described in your notice, including but not limited to:

- Service dates: **July 10–12, 2026**
- Operating hours: **10:00 a.m. – 9:00 p.m.**
- Deployment of a minimum of **20 full-size, ADA-accessible buses**
- Required service frequency between park-and-ride locations and the event venue
- Operation on gravel roads and constrained site-access routes
- Provision of appropriate on-site ground operations support

As stated in LTD's notice, Lane Transit District would only provide this charter service **in the absence of any willing and able registered private charter provider**. Given Pronto's affirmative response and demonstrated capability, **the conditions under which LTD could lawfully provide this charter service are not met.**

Accordingly, and consistent with the **FTA Charter Service Rule**, we understand that Lane Transit District will **step aside from directly providing this charter service**, allowing the service to be provided by a registered private charter operator.

Capacity Contingency (Leasing Only)

For clarity and completeness, Pronto's operational plan contemplates that **if aggregate private charter capacity were to be fully exhausted**, Pronto may **reach out to Lane Transit District to lease buses and/or drivers strictly as supplemental capacity**, under **Pronto's operational direction and control**, and **not as charter service operated by LTD**. Any such leasing arrangement would be structured to remain fully compliant with **49 CFR Part 604**, with Pronto remaining the charter service provider of record.

Please advise if LTD requires any additional documentation from Pronto to confirm availability or qualifications, or if there are administrative next steps to formally close out LTD's charter notice for this event.

We appreciate LTD's adherence to federal charter service requirements and look forward to working collaboratively to support the Oregon Country Fair with safe, reliable, and compliant transportation services.

Sincerely,
Kumar Shah

Kumar Shah
President & CEO
Accelar, Inc. dba Pronto Journeys
84 W Santa Clara St
Suite 700
San Jose, CA 95113
kumar@accelar.com
650.249.7418 (w)
408.472.5662 (mobile)

From: Bret Smith <Bret.Smith@ltd.org>
Sent: Wednesday, December 24, 2025 10:40 AM
To: Bret Smith <Bret.Smith@ltd.org>
Subject: 2026 Oregon Country Fair charter posting

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Lane Transit District has interest in providing this service if there are no registered charter providers who show interest to provide this service.

Thank you,

Bret Smith
Lane Transit District
Senior Service Planner
P:541-682-6191 | F: 541- 682-6111
Contact us at ltd.org

Kumar Shah

From: Kumar Shah
Sent: Thursday, January 8, 2026 2:57 PM
To: kbolton@oregoncountryfair.org
Cc: Pronto Journeys
Subject: RE: 2026 Oregon Country Fair

Dear Kristen,

Thank you again for taking the time to speak earlier today. I appreciate you sharing your perspective candidly, and I want to reiterate that our intent is **not** to put the Oregon Country Fair in a difficult position or to jeopardize shuttle access for fairgoers.

I understand your concerns regarding site access, operating conditions in a forested environment, cost sensitivity given OCF's nonprofit mission, and the importance of ensuring that the shuttle service remains reliable and uninterrupted. Those are all legitimate considerations, and they are exactly the types of issues we evaluate carefully when planning special-event transportation.

At this stage, we are **not asking OCF to make any immediate decisions**, nor are we asking you to commit to a particular operator. We are simply completing our due diligence by reviewing historical operating records and service parameters so that we can better understand what has worked in the past and whether there are practical ways to improve or replicate that service using private charter resources.

Our goal is to determine whether there is a **compliant, operationally viable, and cost-conscious path forward** that works for OCF — not to create disruption or uncertainty. If, after completing that review, it becomes clear that no such path exists, we will take that into account before making any further decisions.

In the meantime, please know that we value OCF's mission and the importance of this event to the community, and we will continue to approach this thoughtfully and in good faith. I would welcome the opportunity to reconnect once we have had a chance to review the historical information – which we have formally / officially requested already - and discuss options calmly and collaboratively.

Thank you again for your openness and for the work you do in organizing the Fair. Please don't hesitate to contact me if there's anything else you need from us.

Warm regards,
Kumar



Pronto Journeys
Safe. Dependable. Comfortable.

Group Transportation since 2005
60K+ Trips. 2.4M+ Passengers.
100% Injury-free

RATING: 4.93 / 5.0
★★★★★

Kumar Shah, President
+1-650-249-7418
Kumar@ProntoJourneys.com
84 W Santa Clara St, Ste 700
San Jose, CA 95113



From: kbolton@oregoncountryfair.org <kbolton@oregoncountryfair.org>
Sent: Monday, January 5, 2026 12:44 PM
To: Kumar Shah <kumar@prontojourneys.com>
Cc: Pronto Journeys <cs@prontojourneys.com>
Subject: RE: 2026 Oregon Country Fair

Thanks Kumar! See you Thursday at 11am.

Kirsten Bolton
Executive Director
Oregon Country Fair
442 Lawrence St.
Cell#541-321-6626
Office#541-343-4298



From: Kumar Shah <kumar@prontojourneys.com>
Sent: Monday, January 5, 2026 12:04 PM
To: kbolton@oregoncountryfair.org
Cc: Pronto Journeys <cs@prontojourneys.com>
Subject: RE: 2026 Oregon Country Fair

Hi Kirsten,

Happy 2026!! Hope you had a wonderful holiday.

We have scheduled the call on Thursday @ 11 am Pacific. The meeting invitation has been sent to you.

Best regards,
Kumar

From: kbolton@oregoncountryfair.org <kbolton@oregoncountryfair.org>
Sent: Monday, January 5, 2026 9:10 AM
To: Kumar Shah <kumar@prontojourneys.com>
Cc: Pronto Journeys <cs@prontojourneys.com>
Subject: RE: 2026 Oregon Country Fair

Hi Kumar,

Sorry for the delay in responding. I am available for a meeting tomorrow or Thursday. Let me know what time works best for you.

Have a great day,

Kirsten Bolton
Executive Director
Oregon Country Fair
442 Lawrence St.
Cell#541-321-6626
Office#541-343-4298



From: Kumar Shah <kumar@prontojourneys.com>
Sent: Tuesday, December 30, 2025 9:24 PM
To: kbolton@oregoncountryfair.org
Cc: Kumar Shah <kumar@prontojourneys.com>; Pronto Journeys <cs@prontojourneys.com>
Subject: RE: 2026 Oregon Country Fair
Importance: High

Hi Kristen,

Good to e-meet you. I received your email below and your v-mail from earlier today.

Below is the email I had sent to you on 12/26. Just want to make sure you have received this email. You are in great hands with us / Pronto. We will take care of all the requirements for the Oregon Country Fair. Once we have a comprehensive understanding of your needs, we will work out the logistics and scheduling for the OCF and share with you and your team all the details.

I am traveling overseas and will be returning to the US on 01/03/2026. May I suggest we schedule a call on Tuesday, 01/05? I am available between 11 am and 1 pm Pacific Time. Let me know what works best for you.

Best regards,
Kumar

Dear Kristen,

I am writing on behalf of **Pronto Journeys**, a **registered private charter transportation provider (FTA Charter Registration ID: 6643)**, regarding shuttle transportation services for the **2026 Oregon Country Fair**, scheduled for **July 10–12, 2026**.

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Pronto operates a **“click-and-mortar” transportation model**, combining:

- **On-the-ground operational expertise** (fleet sourcing, dispatch, ground crews, site management), and
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This hybrid / integrated approach allows Pronto to deliver the reliability of a traditional operator with the scalability, transparency, and efficiency of a technology platform.

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 - **On-site ground operations teams** managing loading, unloading, queue flow, and accessibility assistance
 - **Real-time command and control**, enabling rapid response to demand surges, weather, or disruptions
 - **Direct coordination with event staff, traffic control, and local authorities**
 - **A clear, guest-friendly rider experience**, including wayfinding, signage, staffing, and communications
-

Capacity Resiliency & Coordination with LTD

To ensure service continuity under all conditions, Pronto's operating plan allows that **in the unlikely event aggregate private charter capacity is fully utilized**, Pronto may **supplement capacity by leasing buses and/or drivers from Lane Transit District**, under **Pronto's operational direction and control**. Any such supplemental arrangements would remain fully compliant with **FTA charter service requirements**, with Pronto serving as the charter service provider of record.

We welcome the opportunity to coordinate directly with Oregon Country Fair staff and schedule an online Zoom session to discuss service planning, logistics, and next steps, and to tailor the shuttle operation to OCF's unique site conditions, sustainability goals, and attendee experience.

Thank you for your time and for your commitment to providing safe, accessible, and environmentally responsible transportation options for fairgoers.

Warm regards,
Kumar Shah

Kumar Shah
President & CEO
Accelar, Inc. dba Pronto Journeys
84 W Santa Clara St
Suite 700
San Jose, CA 95113
kumar@accelar.com
650.249.7418 (w)
408.472.5662 (mobile)



Scan me to watch me in action

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100% Injury-free

RATING: 4.93 / 5.0
★★★★★

Kumar Shah, President
+1-650-249-7418
Kumar@ProntoJourneys.com
84 W Santa Clara St, Ste 700
San Jose, CA 95113

Images of various Pronto Journeys vehicles: a large bus, a smaller bus, a truck, and two vans.

From: kbolton@oregoncountryfair.org <kbolton@oregoncountryfair.org>

Sent: Tuesday, December 30, 2025 11:35 AM

To: kumar@accelar.com <kumar@accelar.com>

Subject: 2026 Oregon Country Fair

Hello Kumar,

Lane Transit District (LTD) forwarded me your response to the Oregon Country Fair Charter posting. Please call me at your earliest convenience to discuss. LTD does not negotiate the charter service on our behalf, so we need to discuss your ability to meet our requirements.

Happy New Year!

Kirsten Bolton
Executive Director
Oregon Country Fair
442 Lawrence St.
Cell#541-321-6626
Office#541-343-4298

Kumar Shah

From: kbolton@oregoncountryfair.org
Sent: Friday, January 9, 2026 9:31 AM
To: Kumar Shah
Cc: Pronto Journeys
Subject: RE: 2026 Oregon Country Fair

Thank you, Kumar. I look forward to hearing from you in the next few weeks.

Kirsten Bolton
Executive Director
Oregon Country Fair
442 Lawrence St.
Cell#541-321-6626
Office#541-343-4298



From: Kumar Shah
Sent: Thursday, January 8, 2026 2:57 PM
To: kbolton@oregoncountryfair.org
Cc: Pronto Journeys
Subject: RE: 2026 Oregon Country Fair

Dear Kristen,

Thank you again for taking the time to speak earlier today. I appreciate you sharing your perspective candidly, and I want to reiterate that our intent is **not** to put the Oregon Country Fair in a difficult position or to jeopardize shuttle access for fairgoers.

I understand your concerns regarding site access, operating conditions in a forested environment, cost sensitivity given OCF's nonprofit mission, and the importance of ensuring that the shuttle service remains reliable and uninterrupted. Those are all legitimate considerations, and they are exactly the types of issues we evaluate carefully when planning special-event transportation.

At this stage, we are **not asking OCF to make any immediate decisions**, nor are we asking you to commit to a particular operator. We are simply completing our due diligence by reviewing historical operating records and service parameters so that we can better understand what has worked in the past and whether there are practical ways to improve or replicate that service using private charter resources.

Our goal is to determine whether there is a **compliant, operationally viable, and cost-conscious path forward** that works for OCF — not to create disruption or uncertainty. If, after completing that review, it becomes clear that no such path exists, we will take that into account before making any further decisions.

In the meantime, please know that we value OCF's mission and the importance of this event to the community, and we will continue to approach this thoughtfully and in good faith. I would welcome the opportunity to reconnect once we have had a chance to review the historical information – which we have formally / officially requested already - and discuss options calmly and collaboratively.

Thank you again for your openness and for the work you do in organizing the Fair. Please don't hesitate to contact me if there's anything else you need from us.

Warm regards,
Kumar



From: kbolton@oregoncountryfair.org <kbolton@oregoncountryfair.org>

Sent: Monday, January 5, 2026 12:44 PM

To: Kumar Shah <kumar@prontojourneys.com>

Cc: Pronto Journeys <cs@prontojourneys.com>

Subject: RE: 2026 Oregon Country Fair

Thanks Kumar! See you Thursday at 11am.

Kirsten Bolton
Executive Director
Oregon Country Fair
442 Lawrence St.
Cell#541-321-6626
Office#541-343-4298



From: Kumar Shah <kumar@prontojourneys.com>
Sent: Monday, January 5, 2026 12:04 PM
To: kbolton@oregoncountryfair.org
Cc: Pronto Journeys <cs@prontojourneys.com>
Subject: RE: 2026 Oregon Country Fair

Hi Kirsten,

Happy 2026!! Hope you had a wonderful holiday.

We have scheduled the call on Thursday @ 11 am Pacific. The meeting invitation has been sent to you.

Best regards,

Kumar

From: kbolton@oregoncountryfair.org <kbolton@oregoncountryfair.org>
Sent: Monday, January 5, 2026 9:10 AM
To: Kumar Shah <kumar@prontojourneys.com>
Cc: Pronto Journeys <cs@prontojourneys.com>
Subject: RE: 2026 Oregon Country Fair

Hi Kumar,

Sorry for the delay in responding. I am available for a meeting tomorrow or Thursday. Let me know what time works best for you.

Have a great day,

Kirsten Bolton
Executive Director
Oregon Country Fair
442 Lawrence St.
Cell#541-321-6626
Office#541-343-4298



From: Kumar Shah <kumar@prontojourneys.com>
Sent: Tuesday, December 30, 2025 9:24 PM
To: kbolton@oregoncountryfair.org
Cc: Kumar Shah <kumar@prontojourneys.com>; Pronto Journeys <cs@prontojourneys.com>
Subject: RE: 2026 Oregon Country Fair
Importance: High

Hi Kristen,

Good to e-meet you. I received your email below and your v-mail from earlier today.

Below is the email I had sent to you on 12/26. Just want to make sure you have received this email. You are in great hands with us / Pronto. We will take care of all the requirements for the Oregon County Fair. Once we have a comprehensive understanding of your needs, we will work out the logistics and scheduling for the OCF and share with you and your team all the details.

I am traveling overseas and will be returning to the US on 01/03/2026. May I suggest we schedule a call on Tuesday, 01/05? I am available between 11 am and 1 pm Pacific Time. Let me know what works best for you.

Best regards,
Kumar

Dear Kristen,

I am writing on behalf of **Pronto Journeys**, a **registered private charter transportation provider (FTA Charter Registration ID: 6643)**, regarding shuttle transportation services for the **2026 Oregon Country Fair**, scheduled for **July 10–12, 2026**.

Lane Transit District recently issued a charter service notice under **49 CFR Part 604.14**, seeking to determine whether any registered private charter providers were willing and able to provide shuttle service between designated park-and-ride locations and the fair venue. Pronto has **formally responded confirming that we are willing and able to provide the full scope of services described** in that notice.

Under the **Federal Transit Administration's Charter Service Rule**, when a registered private charter provider affirms its willingness and ability to provide the service, a public transit agency such as Lane Transit District **may not directly provide the charter service**. In such circumstances, the service must be provided by a private charter operator.

Who We Are: Pronto Journeys

Pronto Journeys brings more than **20 years of continuous operating history** delivering charter, shuttle, and special-event transportation across the United States. Over that period, Pronto and its affiliates have:

- Operated **60K+ charter trips**
- Transported **2.5M+** across school, university, corporate, sports, and public events
- Built a nationwide affiliate network of **6,700+ licensed, insured charter operators**
- Supported **large, multi-day, high-frequency events** requiring ADA accessibility, precise scheduling, and complex site logistics

Our experience includes **major professional sports and special-event shuttle operations**, including long-running shuttle programs supporting **NFL games and large events at Levi's Stadium, 49ers home games under a 4-year contract with San Francisco 49ers**, as well as college athletics, festivals, conventions, and civic events.

Safety and compliance are foundational to our operations. We work exclusively with operators that meet strict licensing, insurance, and safety requirements, and we maintain a strong operational safety record across our network.

What Makes Pronto Different: Our Click-and-Mortar Model:

Pronto operates a **"click-and-mortar" transportation model**, combining:

- **On-the-ground operational expertise** (fleet sourcing, dispatch, ground crews, site management), and
- A **modern, cloud-based booking and operations platform** purpose-built for group and event transportation

This hybrid / integrated approach allows Pronto to deliver the reliability of a traditional operator with the scalability, transparency, and efficiency of a technology platform.

Our Cloud-Based Platform — "Uber for Groups"

Pronto's online, cloud-based booking portal is often described as **"Uber for Groups"**. It provides:

- Centralized trip planning, booking, and dispatch
- Real-time visibility into fleet deployment and capacity
- Automated coordination across multiple operators and vehicle types
- Transparent pricing and service specifications
- A single system of record for planning, operations, and reporting

For events like the Oregon Country Fair, this means **better planning, fewer surprises, and real-time operational control** throughout the event.

What OCF Will Experience with Pronto (vs. Traditional Transit)

While remaining fully compliant with all federal charter service requirements, Pronto delivers a purpose-built event transportation model that differs materially from traditional public transit operations:

- **Single point of accountability** — one entity responsible for planning, execution, safety, and performance
- **Event-specific service design**, tailored to attendance patterns rather than fixed-route assumptions
- **Dedicated ADA-accessible fleet planning**, not shared with daily route service
- **On-site ground operations teams** managing loading, unloading, queue flow, and accessibility assistance
- **Real-time command and control**, enabling rapid response to demand surges, weather, or disruptions
- **Direct coordination with event staff, traffic control, and local authorities**
- A **clear, guest-friendly rider experience**, including wayfinding, signage, staffing, and communications

Capacity Resiliency & Coordination with LTD

To ensure service continuity under all conditions, Pronto's operating plan allows that **in the unlikely event aggregate private charter capacity is fully utilized**, Pronto may **supplement capacity by leasing buses and/or drivers from Lane Transit District**, under **Pronto's operational direction and control**. Any such supplemental arrangements would remain fully compliant with **FTA charter service requirements**, with Pronto serving as the charter service provider of record.

We welcome the opportunity to coordinate directly with Oregon Country Fair staff and schedule an online Zoom session to discuss service planning, logistics, and next steps, and to tailor the shuttle operation to OCF's unique site conditions, sustainability goals, and attendee experience.

Thank you for your time and for your commitment to providing safe, accessible, and environmentally responsible transportation options for fairgoers.

Warm regards,
Kumar Shah

Kumar Shah
President & CEO
Accelar, Inc. dba Pronto Journeys
84 W Santa Clara St
Suite 700
San Jose, CA 95113
kumar@accelar.com
650.249.7418 (w)
408.472.5662 (mobile)



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Pronto Journeys
Safe. Dependable. Comfortable.

Group Transportation since 2005
60K+ Trips. 2.4M+ Passengers.
100% Injury-free

RATING: 4.93 / 5.0
★★★★★

Kumar Shah, President
+1-650-249-7418
Kumar@ProntoJourneys.com
84 W Santa Clara St, Ste 700
San Jose, CA 95113



From: kbolton@oregoncountryfair.org <kbolton@oregoncountryfair.org>

Sent: Tuesday, December 30, 2025 11:35 AM

To: kumar accelar.com <kumar@accelar.com>

Subject: 2026 Oregon Country Fair

Hello Kumar,

Lane Transit District (LTD) forwarded me your response to the Oregon Country Fair Charter posting. Please call me at your earliest convenience to discuss. LTD does not negotiate the charter service on our behalf, so we need to discuss your ability to meet our requirements.

Happy New Year!

Kirsten Bolton
Executive Director
Oregon Country Fair
442 Lawrence St.
Cell#541-321-6626
Office#541-343-4298



Pronto Journeys

From: kbolton@oregoncountryfair.org
Sent: Tuesday, March 3, 2026 10:32 AM
To: Kumar Shah
Cc: Pronto Journeys; 'Bret Smith'; 'Cammie Harris'; 'Heather Lindsay'; Eric.Breitenstein@ltd.org
Subject: RE: Ensuring Shuttle Service Certainty for OCF 2026

Hello Kumar,

Thank you for reaching out. Option 1 is a no go. As I have said numerous times, we will not trim our trees. Option 2 is doable, if LTD is willing to lease Pronto their vehicles. LTD is a local entity that has the ability to service our event because their vehicles can handle our site, no tree trimming required. I have cc'd LTD on this email to get confirmation that this is even an option for them.

As for a three-year contract, we would want to see if you can provide the service efficiently the first year before signing a three-year contract.

Have a nice day,

Kirsten Bolton
Executive Director
Oregon Country Fair
442 Lawrence St.
Cell#541-321-6626
Office#541-343-4298



From: Kumar Shah <kumar@prontojourneys.com>
Sent: Tuesday, March 3, 2026 8:11 AM
To: kbolton@oregoncountryfair.org
Cc: Kumar Shah <kumar@prontojourneys.com>; Pronto Journeys <cs@prontojourneys.com>
Subject: Ensuring Shuttle Service Certainty for OCF 2026
Importance: High

Dear Kirsten,

Our objective has always been simple: to ensure that Oregon Country Fair attendees continue to have a reliable shuttle service option available in 2026 and beyond.

We recognize that shuttle service is important not only for your guests but also for traffic management, emissions reduction, and community impact in Veneta. Our focus is to provide OCF with certainty and flexibility — and to place you fully in the driver’s seat regarding how that service is delivered.

To that end, we are outlining two structured pathways that both meet the 2025 ridership baseline and provide budget clarity.

Option 1 – Dedicated Motorcoach Shuttle Program

- Dedicated fleet sized to meet peak 2025 hourly demand
- Comfortable seated capacity for all riders
- Fixed Contract Price: **\$110,000**
- In exchange for a three-year agreement, Pronto would absorb the one-time \$8,000 clearance cost
- 3% annual adjustment

This structure provides a fully dedicated fleet and operational certainty over a multi-year horizon.

Option 2 – LTD Vehicles & Operators (Leasing Structure)

As a registered charter provider, Pronto is responsible for ensuring any solution aligns with the FTA Charter Rule framework. We are engaged in discussions with Lane Transit District regarding a compliant vehicle and operator leasing structure.

Under this model:

- LTD vehicles and operators would be utilized
- Pronto would administer and manage the charter service
- Fixed Contract Price: **\$110,000**
- 3% annual adjustment

This pricing remains more than 10% below what OCF paid in 2025 and reflects a demand-driven provisioning model based on actual hourly ridership data.

Both pathways:

- Meet or exceed 2025 rider volumes
- Provide ADA compliance
- Deliver predictable budgeting
- Ensure uninterrupted shuttle availability
- 10%+ savings compared to the shuttle expenses you incurred in 2025 and prior years

Our commitment is to make sure OCF attendees have shuttle service — period. You and your team can select the pathway that best aligns with your operational preferences and long-term vision. Regardless of the option you select, we – the Pronto team and our local team in Eugene – will ensure smooth and successful operation of the OCF shuttle service for you.

If helpful, we would be glad to review both structures with you and any members of your team or Board to answer questions and provide additional clarity.

We are ready, willing, and able to formalize the arrangement between OCF and Pronto – for either of the two options – at your earliest convenience.

Respectfully,
Kumar



From: Pronto Journeys <cs@prontojourneys.com>
Sent: Monday, February 23, 2026 2:31 PM
To: kbolton@oregoncountryfair.org
Cc: Kumar Shah <kumar@prontojourneys.com>
Subject: 2026 OCF Shuttle Proposal – Executive Summary & Cost Overview
Importance: High

Dear Kirsten,

We are delighted to share with you our 2026 Oregon Country Fair shuttle services proposal.

Over the past several weeks, we have:

- Conducted a full route validation and dry run
- Incorporated three years of historical hourly ridership data
- Built a peak-hour capacity model using 2025 attendance as the baseline
- Secured a dedicated fleet of luxury motorcoaches
- Quantified site clearance requirements to remove uncertainty

Executive Summary

For 2026, we propose to provide the number of buses required to fully handle peak loading hours on each of the three event days.

The total seating capacity of 13,860 provided over the 3 days will exceed the **12,230 shuttle riders** recorded in 2025.

All coaches include:

- 56 comfortable seats
- Air conditioning, Restrooms
- WiFi, power outlets
- Audio/video systems

The difference between the experience for the attendees we will deliver compared to LTD / Transit experience is like the difference between **DAY** and **NIGHT**. In the case of LTD / Transit, 2/3rds of the riders end up having to stand shoulder-to-shoulder for the 30+ minute ride. Contrast that against the Pronto experience – everyone will have a comfortable seat.

More importantly, with Pronto you will have a dedicated fleet of motor coaches and we will be able to deploy them whenever and wherever they are needed – without constraint. In the case of LTD – as you are aware – OCF was only able to get the capacity that LTD was able to spare for you with daily transit always getting the top priority.

With this platform in place, OCF will be able to easily extend the service to neighboring cities and intercity express services to Portland and others.

Pricing

Total Contract Price: **\$110,285.71**

For reference, public records indicate OCF paid a total of **\$123,301** to LTD in 2025

We are sure you and the OCF team would agree that Pronto delivers a far superior experience to your customers at a price that is ~10% below what you paid LTD. The price for private motorcoach option generally tends to be 30%+ higher compared to public transit. What we are offering to you – **price that is 10% lower than transit** – is unbeatable VALUE.

Tree Clearance

We have obtained a formal bid from a licensed local contractor for required clearance work:

Total one-time cost: **\$8,000**. Once this clearance has been completed, we are absolutely confident that we will be able to operate the motorcoaches with the utmost safety for the riders and safety and protection for the equipment. We know this has been a major concern for you. This removes any and all uncertainties regarding route suitability and establishes a stable path forward for future years.

Let us know your availability for a 30-minute call tomorrow (Tuesday, 02/24) morning for a more detailed walkthrough of our proposal.

Respectfully,
Sophia



From: Pronto Journeys <cs@prontojourneys.com>

Sent: Sunday, February 22, 2026 1:53 PM

To: kbolton@oregoncountryfair.org

Cc: Pronto Affiliates <affiliates@prontojourneys.com>; Pronto Journeys <cs@prontojourneys.com>; Kumar Shah

<kumar@prontojourneys.com>

Subject: Subject: OCF Shuttle Planning Update – Site Visit & Capacity Modeling

Dear Kirsten,

I wanted to provide you with a brief update on our progress as we finalize our proposal for the 2026 Oregon Country Fair shuttle service.

Over the past week, we have completed several key steps:

1 Site Visit & Route Validation

Our operations partner in Eugene conducted a full dry run of the Eugene–OCF route to validate:

- Travel time in both directions
- Staging feasibility
- Turn movements
- Load/unload access points
- Potential pinch points along the corridor

We now have a precise understanding of the operational geometry of the route and realistic cycle times. The field findings were very helpful in refining our planning model.

I am attaching short video clips:

Entrance to OCF (Nansleeze Rd.)

<https://www.dropbox.com/scl/fi/xglfji6sx551sctijfa2/Entrance-to-Oregon-Country-Fair.mp4?rlkey=8g5j6uf5gblyl42jxdqujsx8c&st=yedkp44o&dl=0>

Exit from OCF (Aero Rd.)

<https://www.dropbox.com/scl/fi/g7hqww2xtzq33woy9f81o/Exit-to-Oregon-Country-Fair.mp4?rlkey=lmj5qras665fv6rs45r5bzu42&st=5lh9jytx&dl=0>

Exit from OCF (Aero Rd.) Pt.2

<https://www.dropbox.com/scl/fi/8nks1neg1trny16n1gdns/Exit-of-Oregon-Country-Fair.mp4?rlkey=1sa8dahw4h3lalv1arshtd5ce&st=qo5m4hbo&dl=0>

2 Historical Data Integration

Since our last communication, we have received detailed hourly ridership data from prior years. We have incorporated that information into a demand-based capacity model.

For planning purposes, we are using **2025 ridership levels as the baseline**, as that represents the most current and complete dataset.

Rather than sizing service based on fixed assumptions, we are modeling:

- Hour-by-hour boarding patterns
- Morning vs afternoon flow imbalance
- Peak 4–8 PM exit windows
- Realistic cycle times based on field validation

This allows us to right-size fleet deployment by day and by time window, while still building in appropriate buffers.

3 Demand-Responsive Structure

We are structuring the proposal to allow:

- Addition of capacity with as little as 48-hour notice
- Scaling based on actual booking data
- Operational flexibility by day

Our goal is to ensure service reliability while keeping the operation efficient and cost-conscious.

We are pleased to reaffirm that we will deliver to OCF a fully dedicated, seated, air-conditioned coach fleet at a total cost that is below what OCF has paid in recent years for standard transit service.

We remain on track to submit our full proposal on **Wednesday, 02/25**, as planned.

Best regards,
Sophia

From: Pronto Journeys <cs@prontojourneys.com>
Sent: Wednesday, February 18, 2026 11:22 PM
To: kbolton@oregoncountryfair.org
Cc: Pronto Affiliates <affiliates@prontojourneys.com>; Kumar Shah <kumar@prontojourneys.com>
Subject: RE: OCF 2026 Shuttle Planning – Budget Alignment & Operational Inputs

Dear Karen,

We also want to let you know that we have had extensive discussions with Bret @ LDT to learn about their experience and operating history with the shuttle service. Bret has been immensely helpful.

Our affiliate partner in Eugene is quite familiar with OCF. We will be doing a ‘dry run’ of the Eugene to OCF route in a motor coach shortly and will gather all the data and input to develop a comprehensive plan for the shuttle operation. We will share with you our findings.

We want to make sure you get the full benefit of the extensive modeling we have done for the shuttle service / operation, and combine it with our own experience in operating the shuttle / route and all the intricacies which you and Bret and others have shared with us.

We are looking forward to sharing our proposal with you next week.

Best regards,
Sophia

From: Pronto Journeys <cs@prontojourneys.com>
Sent: Wednesday, February 18, 2026 11:01 PM
To: kbolton@oregoncountryfair.org
Cc: Pronto Journeys <cs@prontojourneys.com>; Pronto Affiliates <affiliates@prontojourneys.com>; Kumar Shah <kumar@prontojourneys.com>
Subject: OCF 2026 Shuttle Planning – Budget Alignment & Operational Inputs

Dear Kirsten,

We are delighted to reconnect with you. We have completed the modeling and planning for the shuttle service operation for OCF. The model is flexible with variables which will be completely in and under your and your team’s control.

Before getting into planning details, I want to address what I know is your primary concern — cost.

Based on the modeling we have completed using historical shuttle volumes and operating patterns, we are confident that:

We will deliver a fully dedicated, seated, air-conditioned coach fleet at a **total cost that is below what OCF has paid in recent years** for standard transit service. Your input on projections and shuttle service operation could result in a **substantially reduced cost structure** compared to what you have paid over the past 3 years.

What we will deliver to you:

- No increase in budget exposure with the potential to reduce your cost substantially
- No compromise on capacity
- A materially improved rider experience

We have the numbers to back up our assertions which we will share with you in our proposal.

Rider Experience – A Meaningful Upgrade

The difference for the riders will be like between **night** and **day**:

Under the transit model:

- ~35 seated positions on articulated buses
- Remaining riders standing – shoulder-to-shoulder in sweltering heat
- Mad dash to storm the doors to secure seats upon boarding with 2/3rds of the riders facing disappointment of not finding a seat for the long '20-30 minute' ride

Under our proposed model:

- 55 seats per coach
- Every rider seated
- Air-conditioned touring coaches
- No standing loads
- Controlled boarding environment

For a 20–30 minute ride in July, at the beginning of the day and especially at the end of a long day, that difference is not cosmetic — it would set the right tone for their experience in the morning and leave them with a relaxing and pleasant memory of their day at OCF.

Our goal is to make the transportation component feel orderly, comfortable, and predictable. With a **local, Eugene-based affiliate**, who is well known, has excellent reputation and is intimately familiar with Eugene, we are confident that the OCF attendees will be served exceedingly well.

Now – Planning Inputs We Need From You

We have completed baseline modeling internally and have developed three (3) scenarios for required capacity. To finalize deployment levels and pricing precision, we need alignment on a few key variables:

1 Ridership Baseline

Should we model 2026 closer to:

- 2023 ridership levels – **18,022** - or 2025 levels – **12,230**

The difference materially affects daily fleet sizing.

We also propose making the operation demand-responsive by day based on actual bookings. To do that:

- How frequently can we receive ticket sales updates?
- When would you want fleet levels finalized?

The good news is we can revise our plan all the way through Mid June with the ability to add more capacity with just 48-hour notice.

2 Upload / Download Objective

The biggest cost driver is the time window allocated for peak loading and unloading.

We have modeled:

- ~4-hour cycle (similar to prior years)
- ~3-hour cycle
- ~2-hour accelerated flow

Each scenario changes total bus count and cost.

What is your guidance for us for 2026?

3 Optional Access Considerations

Eugene/Springfield will remain core. However, we need your input on:

- Shuttle for Amtrak synced with Amtrak arrivals and departures
- Potential demand from Corvallis, Portland and other cities
- Known geographic concentrations of ticket buyers

We are not assuming expansion — only ensuring we plan intelligently. We have sufficient time to plan the routes, schedules based on historical data. The benefit of setting up separate routes / schedules is we can peel off those riders from the ones from Eugene, which will further reduce the congestion at peak times and consequently reduce the wait times for the riders.

From our end – we know we can deliver this to you in 2026. Based on your input and guidance, we can defer this to next year or beyond.

Dedicated Fleet Advantage

Unlike prior years where buses were shared with regular transit operations and hence not available on certain days at certain times – which creates constraints which are beyond your control - our fleet would be fully dedicated to OCF for the duration of the event – under your and your team’s full, exclusive, and sole control.

That means:

- No competing service constraints and no trade-offs
- Ability to upsize or downsize fleet levels up to three weeks prior and to add more capacity with 48-hour notice
- Predictable capacity allocation based on our detailed models
- Complete operational control for you and your team

If you can provide guidance on the above by Monday, we will incorporate it and deliver a finalized proposal by Wednesday, 02/25.

What we will deliver to you:

- Luxurious / comfortable / premium / first class experience to your fans at a substantially reduced cost
- Vastly superior rider comfort and experience compared to the transit experience – difference of ‘day’ and ‘night’
- Deliver to you a turnkey solution with knobs and levers which are totally under your control – as opposed to transit which is not within your sphere or span of control.

We look forward to your input, which would be valuable in helping us apply the right levers to build the plan for you. I know this is a big ask. If you are not able to respond in the suggested time frame, don’t worry about it. We will share with you a few scenarios in our proposal and you will get to pick the one that feels right to you or one that we can further customize for you.

Best regards,
Sophia



From: Kumar Shah <kumar@prontojourneys.com>
Sent: Monday, February 16, 2026 10:06 PM
To: kbolton@oregoncountryfair.org
Cc: Pronto Journeys <cs@prontojourneys.com>
Subject: RE: OCF Shuttle Services - Update

Dear Kirsten,

Thank you for your note.

We look forward to continuing to learn more about OCF. We have already learned and absorbed a great deal about your operational model, priorities, and values, and we approach every engagement with the understanding that the learning process never stops.

Please be assured that our proposal will meet **all** of your stated operational requirements — including capacity, ADA compliance, air conditioning, and event-day execution standards. At the same time, we are confident we can deliver additional value in terms of comfort, flexibility, and demand-responsive deployment that enhances the overall experience without altering OCF's operating philosophy.

We recognize you may be evaluating other options as well. We welcome that. We simply ask that you review our proposal once submitted. We are confident you will find it thoughtful, disciplined, and aligned with your needs and your vision.

We will be in touch before the end of the week with the formal quote.

Respectfully,
Kumar

From: kbolton@oregoncountryfair.org <kbolton@oregoncountryfair.org>

Sent: Monday, February 16, 2026 12:13 PM

To: Kumar Shah <kumar@prontojourneys.com>

Cc: Pronto Journeys <cs@prontojourneys.com>

Subject: RE: OCF Shuttle Services - Update

You still don't understand OCF. We will never be a 100k visitor event. We don't charge riders to ride the bus. Your buses are too small. We require 120 persons per bus, all buses must be ADA compliant and air conditioned. You don't own the buses you want to rent to us, you are subleasing them and any damage to them will be at your expense.

Please send your quote and we will review and determine if you meet our requirements. I doubt your price will fall within our budget and we will decline your proposal and then there will be no bus service to OCF.

Have a nice day,

Kirsten Bolton
Executive Director
Oregon Country Fair
442 Lawrence St.
Cell#541-321-6626
Office#541-343-4298



From: Kumar Shah <kumar@prontojourneys.com>

Sent: Monday, February 16, 2026 11:51 AM

To: kbolton@oregoncountryfair.org

Cc: Pronto Journeys <cs@prontojourneys.com>

Subject: OCF Shuttle Services - Update

Dear Kirsten,

I hope you are doing well and that preparations for OCF 2026 are progressing smoothly.

As promised, I wanted to provide you with a thoughtful update on where we stand and how we are approaching this.

What We've Learned:

- We have received, reviewed and analyzed all the documents and records shared with us by Lane Transit District (LTD) for the services they provided for OCF for the past several years. Here is a summary of what we have learned about the shuttle services
 - ~25% of the OCF participants take the shuttle from Eugene
 - 11,518 boardings in 2022 / ~45,000 attendees
 - LTD was paid for # of boardings through 2023 and for # of hours starting 2024
 - LTD provided ~20 buses
 - Amounts paid to LTD:
 - \$127,172 in 2024
 - \$123,301 in 2025
- We have reviewed OCF's 990's filed with the IRS for prior years

Where We Stand Operationally

- Identified more than forty (40) 55-Passenger buses for OCF
- Access to even a larger pool of buses and motorcoaches – if needed
- Dedicated on-site operations supervisor for all three days
- Pricing model aligned with – and potentially improve upon – prior years' cost structure

Our goal is to provide stability, clarity and operational strength and a smooth transition.

Pronto Journeys : Our Operating History, Experience and our Journey

We have been operating large scale shuttle services for more than 15 years:

- **San Francisco 49ers home games:**
 - Fan shuttle service from more than 20 cities to the stadium
 - Employees shuttle services for all the employees working at the stadium on game day
- **University of California Berkeley football games :** Fan shuttle service from local transit service locations and from Amtrak station
- **Paul McCartney concert**
- **JayZ and Justin Timberlake concert**
- **President's Cup Golf, Harding Park, San Francisco CA**

Expand the OCF presence through On-line Booking:

Besides group and shuttle transportation services, one other core competency of ours is helping clients establish their online shuttle and transportation service booking portals.

- **ProntoExperiences.com :** Featuring more than 150,000 experiences across more than 6,000 exciting destinations worldwide

- **ProntoJourneys.com** : Online booking for group and student transportation services for groups of any size for any occasion, anytime, anywhere, nationwide
- **49ers shuttles**: Online booking of individual seats from 20+ cities to the Stadium

Based on our 15+ years of operating experience and hundreds of large scale events we can confidently say that we will be able to successfully operate the shuttle service for OCF for 2026 and beyond. Much like we have done with all these contracts, we look forward to working with you and invest in OCF on a multi-year basis.

We would love to feature OCF on ProntoExperiences.com. Just like **Renaissance Faire** - <https://norcalrenfaire.com/> - in the San Francisco Bay Area draws 150,000+ people annually, you have created an event in Oregon that has struck a chord with tens to hundreds of thousands of people. Growing the attendance to 100,000 to 150,000 is well within the realm of possibilities and we assure you we will be there with you every step of the way to make it happen.

Over the years, we have created and developed a loyalty program that our clients love. We can easily extend / include OCF in that program and make the loyalty program – reward points – available to all OCF attendees even as soon as the 2026 event.

We are looking forward to building a partnership that expands and enriches the experience for all the attendees.

The Pronto Approach:

Here are the differences you will see between our approach vs what you have seen with LTD:

1 Unconstrained Capacity

- Transit agencies operate within fleet and labor constraints. We are not limited to a fixed fleet. If demand exceeds expectations, we can scale up with a few hours / a day's notice.
- LTD operates just one type of equipment. With Pronto, you will have access to a variety of vehicles, including but not limited to:
 - 55-Passenger Luxury Motorcoaches
 - 40-45, 25-27 Passenger Shuttle Buses
 - Sprinters
 - Vans

2 Geographic Optionality (When and If you choose)

This is not about growth for growth's sake.

It is about removing structural constraints.

With LTD, service is inherently tied to their geographic footprint.

With Pronto, OCF is not limited to a single corridor.

If at any point — whether in 2026 or five years from now — OCF decides it would like to:

- Add pickup points elsewhere in Eugene
- Include Springfield
- Offer limited service from Corvallis
- Provide capped express access from Portland

You will be able to do so without regulatory or fleet limitations.
There is no obligation to expand.

There is simply no ceiling imposed on you.

Events similar in spirit — such as the **Northern California Renaissance Faire** — draw from a wide regional audience not because of aggressive expansion, but because transportation access makes participation easier and more sustainable.

OCF has built something culturally meaningful. Our role is simply to ensure that geography never becomes a barrier should you ever wish to broaden access.

- With Pronto, you are not limited to just those locations / stops that are served by LTD. We can schedule / set up shuttle services from other locations in Eugene and other neighboring cities and towns of your choosing
- Pickups from other cities: Should you wish to reach out to fans / patrons from neighboring cities:
 - **Eugene** – other locations : Population – 177,000 / 13 miles
 - **Springfield** – Population : 62,000 / 17 miles
 - **Corvallis** - Population : 60,000 / 17 miles
 - **Albany** - Population : Population – 57,000 / 57 miles
 - **Salem** - Population : Population – 177,000 / 80 miles
 - **Portland** - Population - 635,000 (2.5M metro area) / 110 miles
- Additional Services we can offer:
 - Core Shuttle Service – Eugene / Springfield
 - Secondary Shuttle Service – Corvallis
 - Premium Express Service – Albany, Salem
 - Portland Express Service: Strong Cultural / Arts demographic match for OCF
 - 4-6 luxury coaches
 - 1 round-trip per day

These additional services would be scheduled based on demand with more capacity added as / when needed. We can cap the demand by limiting the supply of seats on these shuttles / express service routes.

These additional locations / cities will give people in other cities an opportunity to participate in OCF and could potentially grow your fan base substantially. It will also reduce parking pressure, lower emissions, and give patrons cleaner transportation options from where they actually live.

3 Demand Visibility

- Pre-purchased shuttle access
- Trackable QR codes
- Real-time usage monitoring
- Precise rider counts by day and time

This will give you and your team visibility you have never had before regarding actual usage patterns.

4 Enhanced Rider Experience

- Comfortable 55-seat motorcoaches
- Air-conditioned, touring-grade equipment
- Optional OCF-produced welcome video content and programming onboard

A Necessary Clarification:

I want to address something directly, but respectfully.

Under the FTA Charter Rule, once a willing and able private charter provider has responded affirmatively, the transit agency option is no longer available for direct operation of the charter service. That is not a discretionary matter for OCF or LTD – it is subject to the Federal Laws.

Our intent is not to create hardship for OCF. Quite the opposite — we want to ensure continuity, compliance, and operational excellence.

In one of the communications we reviewed, there was discussion suggesting that if tree pruning was not pursued, we would withdraw. That framing is not constructive for OCF. The Fair deserves a transportation partner that works collaboratively toward solutions rather than positioning operational constraints as leverage.

We are prepared to solve site constraints through proper routing analysis and vehicle selection — not by asking OCF to alter its stewardship of the Land.

OCF – Pronto Partnership:

I know you have not had the opportunity to work with us, but through our interaction and this email with our thoughts and ideas you have a better understanding of who we are and how we operate. We approach each and every client – like OCF – in the spirit of building a long-term and mutually beneficial partnership.

Proposed Next Steps:

I suggest:

1. A working call this week to align on structure.
2. Drafting an agreement that outlines:
 - Scope of service
 - Preliminary fleet assumptions
 - Pricing framework
 - Risk allocation
 - Site visit coordination

We can draft the agreement if you'd like – or be happy to review your draft
3. Site visit in early March to finalize routing, staging and plan for the entire event.

Kirsten, I recognize that this is different from what OCF has historically done. Change is uncomfortable — particularly when it intersects with federal regulation.

However, if we approach this thoughtfully, this transition to Pronto will result in:

- Full compliance with the Federal Laws
- A right-sized, efficient operation
- Stable cost alignment
- And more scalable for future years – we will take you as far as you / your team are willing to go – unconstrained and unrestrained

We are prepared to move forward constructively and collaboratively.

Please let me know your availability for a call this week. We are looking forward to it.

Respectfully,
Kumar Shah
President & CEO
Accelar, Inc. dba Pronto Journeys
FTA Charter Registration ID: 6643



From: Kumar Shah
Sent: Thursday, January 22, 2026 3:12 PM
To: 'kbolton@oregoncountryfair.org' <kbolton@oregoncountryfair.org>
Cc: Pronto Journeys <cs@prontojourneys.com>
Subject: Follow-Up and Next Steps re: OCF Shuttle Service

Dear Kirsten,

Thank you for your candid response and for taking the time to clearly outline Oregon Country Fair's perspective and boundaries. I appreciate the clarity.

I want to be equally clear and reassuring on our end. We fully understand that OCF does not accept partners or sponsors, that you are not seeking marketing support, and that any transportation provider would be engaged strictly as a **vendor**. We also understand the site conditions, cost sensitivities, and the importance of ensuring that shuttle service remains reliable and uninterrupted for the community and fairgoers.

As I shared earlier, our current focus is simply on **doing our due diligence** — understanding the historical operating parameters, site constraints, and cost structure so that we can determine whether there is a **practical, compliant, and responsible way** for us to support OCF without creating risk or disruption for the event.

We are actively working through that analysis now. As promised, once we have completed this work and have a concrete plan to share, **we will reach out to you** so you can review it and decide whether it is worth any further discussion. Until then, we are not asking OCF to make any decisions or commitments.

Thank you again for the transparency and for the work you do in stewarding an event that clearly means a great deal to the community.

Best regards,
Kumar



From: kbolton@oregoncountryfair.org <kbolton@oregoncountryfair.org>

Sent: Wednesday, January 21, 2026 9:14 AM

To: Kumar Shah <kumar@prontojourneys.com>

Cc: Pronto Journeys <cs@prontojourneys.com>

Subject: RE: 2026 Oregon Country Fair

Greetings, Kumar,

Thank you for the update. A few things you should know about Oregon Country Fair. We do not take partners or sponsors for our event. In 56 years of operation, we have never accepted partners or sponsors. We reject Corporate America and promote alternative lifestyles, like being a farmer or artist. We do not need your marketing assistance. We have an in-house marketing department comprised of volunteers that donate their time in support of our mission. We also have an employee dedicated to our marketing and advertising.

If your bid comes in higher than LTD, we will reject it and then we will not have bus service for our event. This will harm our event and local community as it will cause greater congestion around our event, increase carbon emissions and harm the local community of Veneta. You will not be allowed to promote yourself as a partner or sponsor of our event. You would be a vendor, like all the other vendors we work with to put on our event. Any damage to your buses due to collision with our trees will be at your own expense. Any damage you do to our trees will be charged to your organization. I highly encourage you to consider all of this and evaluate whether the time and energy you are putting into bidding on our event could be for nothing.

Have a nice day,

Kirsten Bolton
Executive Director
Oregon Country Fair
442 Lawrence St.
Cell#541-321-6626
Office#541-343-4298



From: Kumar Shah <kumar@prontojourneys.com>
Sent: Wednesday, January 21, 2026 8:11 AM
To: kbolton@oregoncountryfair.org
Cc: Pronto Journeys <cs@prontojourneys.com>
Subject: RE: 2026 Oregon Country Fair

Greetings, Kirsten.

Hope your new year is off to a great start and the plan for OCF are coming together well.

Just want to give you an update on our end. As previously shared, we reached out to Lane Transit District soon after we talked to gather all the historical data and information related to the event. We received the first production of the records earlier in the week. The Lane Transit Finance and Operations teams are working on compiling additional information for us. We have also approved and initiated the payment for production of more detailed information. We expect the bulk of the data to be available to us in the next 2 weeks to allow us to move forward with the submission of our proposal to you soon thereafter.

Our operations team is also working on the logistics for your event. We expect to have those details to be worked out in the near future for successful execution of our plan for your event.

I have also given our marketing team a heads up on your event. They are looking forward to collaborating with you and your marketing team to build broader awareness of your fabulous event and boost the attendance. We also have some ideas on getting some of our affiliates involved in the event as sponsors / partners as well.

Looking forward to connecting with you in a couple of weeks.

Best regards,
Kumar

Pronto Journeys
Safe. Dependable. Comfortable.

Group Transportation since 2005
60K+ Trips. 2.4M+ Passengers.
100% Injury-free

RATING: 4.93 / 5.0
★★★★★

Kumar Shah, President
+1-650-249-7418
Kumar@ProntoJourneys.com
84 W Santa Clara St, Ste 700
San Jose, CA 95113

Images of various Pronto Journeys vehicles: a large white bus, a smaller white van, a white pickup truck, a white box truck, and a white shuttle van.

From: kbolton@oregoncountryfair.org <kbolton@oregoncountryfair.org>
Sent: Friday, January 9, 2026 9:31 AM

To: Kumar Shah <kumar@prontojourneys.com>

Cc: Pronto Journeys <cs@prontojourneys.com>

Subject: RE: 2026 Oregon Country Fair

Thank you, Kumar. I look forward to hearing from you in the next few weeks.

Kirsten Bolton

Executive Director

Oregon Country Fair

442 Lawrence St.

Cell#541-321-6626

Office#541-343-4298



From: Kumar Shah <kumar@prontojourneys.com>

Sent: Thursday, January 8, 2026 2:57 PM

To: kbolton@oregoncountryfair.org

Cc: Pronto Journeys <cs@prontojourneys.com>

Subject: RE: 2026 Oregon Country Fair

Dear Kristen,

Thank you again for taking the time to speak earlier today. I appreciate you sharing your perspective candidly, and I want to reiterate that our intent is **not** to put the Oregon Country Fair in a difficult position or to jeopardize shuttle access for fairgoers.

I understand your concerns regarding site access, operating conditions in a forested environment, cost sensitivity given OCF's nonprofit mission, and the importance of ensuring that the shuttle service remains reliable and uninterrupted. Those are all legitimate considerations, and they are exactly the types of issues we evaluate carefully when planning special-event transportation.

At this stage, we are **not asking OCF to make any immediate decisions**, nor are we asking you to commit to a particular operator. We are simply completing our due diligence by reviewing historical operating records and service parameters so that we can better understand what has worked in the past and whether there are practical ways to improve or replicate that service using private charter resources.

Our goal is to determine whether there is a **compliant, operationally viable, and cost-conscious path forward** that works for OCF — not to create disruption or uncertainty. If, after completing that review, it becomes clear that no such path exists, we will take that into account before making any further decisions.

In the meantime, please know that we value OCF's mission and the importance of this event to the community, and we will continue to approach this thoughtfully and in good faith. I would welcome the opportunity to reconnect once we have had a chance to review the historical information – which we have formally / officially requested already - and discuss options calmly and collaboratively.

Thank you again for your openness and for the work you do in organizing the Fair. Please don't hesitate to contact me if there's anything else you need from us.

Warm regards,
Kumar



From: kbolton@oregoncountryfair.org <kbolton@oregoncountryfair.org>
Sent: Monday, January 5, 2026 12:44 PM
To: Kumar Shah <kumar@prontojourneys.com>
Cc: Pronto Journeys <cs@prontojourneys.com>
Subject: RE: 2026 Oregon Country Fair

Thanks Kumar! See you Thursday at 11am.

Kirsten Bolton
Executive Director
Oregon Country Fair
442 Lawrence St.
Cell#541-321-6626
Office#541-343-4298



From: Kumar Shah <kumar@prontojourneys.com>
Sent: Monday, January 5, 2026 12:04 PM
To: kbolton@oregoncountryfair.org
Cc: Pronto Journeys <cs@prontojourneys.com>
Subject: RE: 2026 Oregon Country Fair

Hi Kirsten,

Happy 2026!! Hope you had a wonderful holiday.

We have scheduled the call on Thursday @ 11 am Pacific. The meeting invitation has been sent to you.

Best regards,
Kumar

From: kbolton@oregoncountryfair.org <kbolton@oregoncountryfair.org>

Sent: Monday, January 5, 2026 9:10 AM

To: Kumar Shah <kumar@prontojourneys.com>

Cc: Pronto Journeys <cs@prontojourneys.com>

Subject: RE: 2026 Oregon Country Fair

Hi Kumar,

Sorry for the delay in responding. I am available for a meeting tomorrow or Thursday. Let me know what time works best for you.

Have a great day,

Kirsten Bolton
Executive Director
Oregon Country Fair
442 Lawrence St.
Cell#541-321-6626
Office#541-343-4298



From: Kumar Shah <kumar@prontojourneys.com>

Sent: Tuesday, December 30, 2025 9:24 PM

To: kbolton@oregoncountryfair.org

Cc: Kumar Shah <kumar@prontojourneys.com>; Pronto Journeys <cs@prontojourneys.com>

Subject: RE: 2026 Oregon Country Fair

Importance: High

Hi Kristen,

Good to e-meet you. I received your email below and your v-mail from earlier today.

Below is the email I had sent to you on 12/26. Just want to make sure you have received this email. You are in great hands with us / Pronto. We will take care of all the requirements for the Oregon Country Fair. Once we have a comprehensive understanding of your needs, we will work out the logistics and scheduling for the OCF and share with you and your team all the details.

I am traveling overseas and will be returning to the US on 01/03/2026. May I suggest we schedule a call on Tuesday, 01/05? I am available between 11 am and 1 pm Pacific Time. Let me know what works best for you.

Best regards,
Kumar

Dear Kristen,

I am writing on behalf of **Pronto Journeys**, a **registered private charter transportation provider (FTA Charter Registration ID: 6643)**, regarding shuttle transportation services for the **2026 Oregon Country Fair**, scheduled for **July 10–12, 2026**.

Lane Transit District recently issued a charter service notice under **49 CFR Part 604.14**, seeking to determine whether any registered private charter providers were willing and able to provide shuttle service between designated park-and-ride locations and the fair venue. Pronto has **formally responded confirming that we are willing and able to provide the full scope of services described** in that notice.

Under the **Federal Transit Administration’s Charter Service Rule**, when a registered private charter provider affirms its willingness and ability to provide the service, a public transit agency such as Lane Transit District **may not directly provide the charter service**. In such circumstances, the service must be provided by a private charter operator.

Who We Are: Pronto Journeys

Pronto Journeys brings more than **20 years of continuous operating history** delivering charter, shuttle, and special-event transportation across the United States. Over that period, Pronto and its affiliates have:

- Operated **60K+ charter trips**
- Transported **2.5M+** across school, university, corporate, sports, and public events
- Built a nationwide affiliate network of **6,700+ licensed, insured charter operators**
- Supported **large, multi-day, high-frequency events** requiring ADA accessibility, precise scheduling, and complex site logistics

Our experience includes **major professional sports and special-event shuttle operations**, including long-running shuttle programs supporting **NFL games and large events at Levi’s Stadium, 49ers home games under a 4-year contract with San Francisco 49ers**, as well as college athletics, festivals, conventions, and civic events.

Safety and compliance are foundational to our operations. We work exclusively with operators that meet strict licensing, insurance, and safety requirements, and we maintain a strong operational safety record across our network.

What Makes Pronto Different: Our Click-and-Mortar Model:

Pronto operates a **“click-and-mortar” transportation model**, combining:

- **On-the-ground operational expertise** (fleet sourcing, dispatch, ground crews, site management), and
- A **modern, cloud-based booking and operations platform** purpose-built for group and event transportation

This hybrid / integrated approach allows Pronto to deliver the reliability of a traditional operator with the scalability, transparency, and efficiency of a technology platform.

Our Cloud-Based Platform — “Uber for Groups”

Pronto’s online, cloud-based booking portal is often described as “**Uber for Groups**”. It provides:

- Centralized trip planning, booking, and dispatch
- Real-time visibility into fleet deployment and capacity
- Automated coordination across multiple operators and vehicle types
- Transparent pricing and service specifications
- A single system of record for planning, operations, and reporting

For events like the Oregon Country Fair, this means **better planning, fewer surprises, and real-time operational control** throughout the event.

What OCF Will Experience with Pronto (vs. Traditional Transit)

While remaining fully compliant with all federal charter service requirements, Pronto delivers a purpose-built event transportation model that differs materially from traditional public transit operations:

- **Single point of accountability** — one entity responsible for planning, execution, safety, and performance
- **Event-specific service design**, tailored to attendance patterns rather than fixed-route assumptions
- **Dedicated ADA-accessible fleet planning**, not shared with daily route service
- **On-site ground operations teams** managing loading, unloading, queue flow, and accessibility assistance
- **Real-time command and control**, enabling rapid response to demand surges, weather, or disruptions
- **Direct coordination with event staff, traffic control, and local authorities**
- A **clear, guest-friendly rider experience**, including wayfinding, signage, staffing, and communications

Capacity Resiliency & Coordination with LTD

To ensure service continuity under all conditions, Pronto’s operating plan allows that **in the unlikely event aggregate private charter capacity is fully utilized**, Pronto may **supplement capacity by leasing buses and/or drivers from Lane Transit District**, under **Pronto’s operational direction and control**. Any such supplemental arrangements would remain fully compliant with **FTA charter service requirements**, with Pronto serving as the charter service provider of record.

We welcome the opportunity to coordinate directly with Oregon Country Fair staff and schedule an online Zoom session to discuss service planning, logistics, and next steps, and to tailor the shuttle operation to OCF’s unique site conditions, sustainability goals, and attendee experience.

Thank you for your time and for your commitment to providing safe, accessible, and environmentally responsible transportation options for fairgoers.

Warm regards,
Kumar Shah

Kumar Shah
President & CEO
Accelar, Inc. dba Pronto Journeys
84 W Santa Clara St
Suite 700
San Jose, CA 95113
kumar@accelar.com
650.249.7418 (w)
408.472.5662 (mobile)



Scan me to watch me in action

A business card for Pronto Journeys. The top left has a circular logo with the word "Pronto" in yellow. Next to it, the company name "Pronto Journeys" is written in large, bold letters, with the tagline "Safe. Dependable. Comfortable." underneath. On the top right is a small image of a dog with the word "Pronto" below it. The card is divided into two main sections. The left section lists "Group Transportation since 2005", "60K+ Trips. 2.4M+ Passengers.", "100% Injury-free", and a "RATING: 4.93 / 5.0" with five stars. The right section is titled "Kumar Shah, President" and lists contact details: a phone number "+1-650-249-7418", an email "Kumar@ProntoJourneys.com", and an address "84 W Santa Clara St, Ste 700 San Jose, CA 95113". At the bottom, there are five small images of different types of vehicles: a large bus, a smaller bus, a truck, a van, and another van.

From: kbolton@oregoncountryfair.org <kbolton@oregoncountryfair.org>

Sent: Tuesday, December 30, 2025 11:35 AM

To: kumar accelar.com <kumar@accelar.com>

Subject: 2026 Oregon Country Fair

Hello Kumar,

Lane Transit District (LTD) forwarded me your response to the Oregon Country Fair Charter posting. Please call me at your earliest convenience to discuss. LTD does not negotiate the charter service on our behalf, so we need to discuss your ability to meet our requirements.

Happy New Year!

Kirsten Bolton
Executive Director
Oregon Country Fair
442 Lawrence St.
Cell#541-321-6626
Office#541-343-4298



Kumar Shah

From: kbolton@oregoncountryfair.org
Sent: Monday, March 16, 2026 9:45 AM
To: Kumar Shah
Cc: Pronto Journeys; 'Bret Smith'
Subject: RE: Ensuring Shuttle Service Certainty for OCF 2026

Hello Kumar,

I appreciate your interest in providing shuttle service to OCF. You are not the first Charter Service to try and find a way to provide service to our event. Had one found a way, we would be working with them now. We respect the FTA ruling and do not have a preference on service provider. We just want shuttle service. I do not see how signing a contract with you will guarantee LTD buses. We tried in years past to get LTD to do peak service schedules, but that was not an option, so I wonder how you think you can get service from LTD, at a lower cost and service that flexes for peak service times. LTD has made it very clear that they do not lease their transit vehicles to third parties.

I once again formally ask you to withdrawal your bid. You have tried every option you can find, to no avail. Time is running out for us to secure LTD to provide our shuttle service. The longer you drag this out, the less likely we are to have shuttle service.

Have a great day,

Kirsten Bolton
Executive Director
Oregon Country Fair
442 Lawrence St.
Cell#541-321-6626
Office#541-343-4298



From: Kumar Shah <kumar@prontojourneys.com>
Sent: Sunday, March 15, 2026 9:39 AM
To: kbolton@oregoncountryfair.org
Cc: Pronto Journeys <cs@prontojourneys.com>; Kumar Shah <kumar@prontojourneys.com>
Subject: RE: Ensuring Shuttle Service Certainty for OCF 2026
Importance: High

Dear Kirsten,

Thank you for your continued engagement over the past several weeks as we have worked through the transportation planning considerations for the 2026 Oregon Country Fair.

As we discussed and further to our email below, our shared objective is to ensure that OCF attendees and the surrounding community continue to have access to reliable shuttle transportation during the event. LTD has successfully supported this service for many years, and we believe the most practical path forward is a structure that allows the existing vehicles and operators to continue serving the event while operating under Pronto's charter registration for the 2026 service.

To that end, we have prepared the attached **Shuttle Transportation Services Agreement** between Oregon Country Fair and Pronto Corporation. The agreement is structured around a **demand-responsive operating model** based on the 2025 ridership baseline (approximately 12,230 riders) and daily / hourly traffic loads for each of the three days of the event, which allows us to deliver the required service capacity while delivering to you the cost savings we previously discussed.

This structure is designed to provide OCF with several important advantages:

- Certainty that shuttle service will be available for the 2026 event
- A cost structure more than **10% below last year's transportation cost**
- Operational flexibility to adjust vehicle deployment based on real-time demand
- The ability to continue utilizing the existing transit vehicle fleet and operators that are familiar with the event

Our intent is to keep the system as efficient and straightforward as possible while ensuring the community and OCF attendees continue to have access to the shuttle service they rely on.

Let's schedule a call to review the proposed agreement and the model, and to make any adjustments needed to align with OCF's operational planning.

We appreciate the opportunity to work with you and remain committed to finding a practical path forward that serves the needs of the Fair and the community for 2026 and beyond.

Respectfully,
Kumar Shah
President
Pronto Journeys
FTA Charter Registration ID: 6643



From: Kumar Shah
Sent: Tuesday, March 3, 2026 8:11 AM

To: kbolton@oregoncountryfair.org

Cc: Kumar Shah <kumar@prontojourneys.com>; Pronto Journeys <cs@prontojourneys.com>

Subject: Ensuring Shuttle Service Certainty for OCF 2026

Importance: High

Dear Kirsten,

Our objective has always been simple: to ensure that Oregon Country Fair attendees continue to have a reliable shuttle service option available in 2026 and beyond.

We recognize that shuttle service is important not only for your guests but also for traffic management, emissions reduction, and community impact in Veneta. Our focus is to provide OCF with certainty and flexibility — and to place you fully in the driver's seat regarding how that service is delivered.

To that end, we are outlining two structured pathways that both meet the 2025 ridership baseline and provide budget clarity.

Option 1 – Dedicated Motorcoach Shuttle Program

- Dedicated fleet sized to meet peak 2025 hourly demand
- Comfortable seated capacity for all riders
- Fixed Contract Price: **\$110,000**
- In exchange for a three-year agreement, Pronto would absorb the one-time \$8,000 clearance cost
- 3% annual adjustment

This structure provides a fully dedicated fleet and operational certainty over a multi-year horizon.

Option 2 – LTD Vehicles & Operators (Leasing Structure)

As a registered charter provider, Pronto is responsible for ensuring any solution aligns with the FTA Charter Rule framework. We are engaged in discussions with Lane Transit District regarding a compliant vehicle and operator leasing structure.

Under this model:

- LTD vehicles and operators would be utilized
- Pronto would administer and manage the charter service
- Fixed Contract Price: **\$110,000**
- 3% annual adjustment

This pricing remains more than 10% below what OCF paid in 2025 and reflects a demand-driven provisioning model based on actual hourly ridership data.

Both pathways:

- Meet or exceed 2025 rider volumes

- Provide ADA compliance
- Deliver predictable budgeting
- Ensure uninterrupted shuttle availability
- 10%+ savings compared to the shuttle expenses you incurred in 2025 and prior years

Our commitment is to make sure OCF attendees have shuttle service — period. You and your team can select the pathway that best aligns with your operational preferences and long-term vision. Regardless of the option you select, we – the Pronto team and our local team in Eugene – will ensure smooth and successful operation of the OCF shuttle service for you.

If helpful, we would be glad to review both structures with you and any members of your team or Board to answer questions and provide additional clarity.

We are ready, willing, and able to formalize the arrangement between OCF and Pronto – for either of the two options – at your earliest convenience.

Respectfully,
Kumar



From: Pronto Journeys <cs@prontojourneys.com>
Sent: Monday, February 23, 2026 2:31 PM
To: kbolton@oregoncountryfair.org
Cc: Kumar Shah <kumar@prontojourneys.com>
Subject: 2026 OCF Shuttle Proposal – Executive Summary & Cost Overview
Importance: High

Dear Kirsten,

We are delighted to share with you our 2026 Oregon Country Fair shuttle services proposal.

Over the past several weeks, we have:

- Conducted a full route validation and dry run
- Incorporated three years of historical hourly ridership data
- Built a peak-hour capacity model using 2025 attendance as the baseline
- Secured a dedicated fleet of luxury motorcoaches
- Quantified site clearance requirements to remove uncertainty

Executive Summary

For 2026, we propose to provide the number of buses required to fully handle peak loading hours on each of the three event days.

The total seating capacity of 13,860 provided over the 3 days will exceed the **12,230 shuttle riders** recorded in 2025.

All coaches include:

- 56 comfortable seats
- Air conditioning, Restrooms
- WiFi, power outlets
- Audio/video systems

The difference between the experience for the attendees we will deliver compared to LTD / Transit experience is like the difference between **DAY** and **NIGHT**. In the case of LTD / Transit, 2/3rds of the riders end up having to stand shoulder-to-shoulder for the 30+ minute ride. Contrast that against the Pronto experience – everyone will have a comfortable seat.

More importantly, with Pronto you will have a dedicated fleet of motor coaches and we will be able to deploy them whenever and wherever they are needed – without constraint. In the case of LTD – as you are aware – OCF was only able to get the capacity that LTD was able to spare for you with daily transit always getting the top priority.

With this platform in place, OCF will be able to easily extend the service to neighboring cities and intercity express services to Portland and others.

Pricing

Total Contract Price: **\$110,285.71**

For reference, public records indicate OCF paid a total of **\$123,301** to LTD in 2025

We are sure you and the OCF team would agree that Pronto delivers a far superior experience to your customers at a price that is ~10% below what you paid LTD. The price for private motorcoach option generally tends to be 30%+ higher compared to public transit. What we are offering to you – **price that is 10% lower than transit** – is unbeatable VALUE.

Tree Clearance

We have obtained a formal bid from a licensed local contractor for required clearance work:

Total one-time cost: **\$8,000**. Once this clearance has been completed, we are absolutely confident that we will be able to operate the motorcoaches with the utmost safety for the riders and safety and protection for the equipment. We know this has been a major concern for you. This removes any and all uncertainties regarding route suitability and establishes a stable path forward for future years.

Let us know your availability for a 30-minute call tomorrow (Tuesday, 02/24) morning for a more detailed walkthrough of our proposal.

Respectfully,
Sophia



From: Pronto Journeys <cs@prontojourneys.com>

Sent: Sunday, February 22, 2026 1:53 PM

To: kbolton@oregoncountryfair.org

Cc: Pronto Affiliates <affiliates@prontojourneys.com>; Pronto Journeys <cs@prontojourneys.com>; Kumar Shah <kumar@prontojourneys.com>

Subject: Subject: OCF Shuttle Planning Update – Site Visit & Capacity Modeling

Dear Kirsten,

I wanted to provide you with a brief update on our progress as we finalize our proposal for the 2026 Oregon Country Fair shuttle service.

Over the past week, we have completed several key steps:

1 Site Visit & Route Validation

Our operations partner in Eugene conducted a full dry run of the Eugene–OCF route to validate:

- Travel time in both directions
- Staging feasibility
- Turn movements
- Load/unload access points
- Potential pinch points along the corridor

We now have a precise understanding of the operational geometry of the route and realistic cycle times. The field findings were very helpful in refining our planning model.

I am attaching short video clips:

Entrance to OCF (Nansleeze Rd.)

<https://www.dropbox.com/scl/fi/xglfji6sx551sctijfa2/Entrance-to-Oregon-Country-Fair.mp4?rlkey=8g5j6uf5gblyl42jxdqujsx8c&st=yedkp44o&dl=0>

Exit from OCF (Aero Rd.)

<https://www.dropbox.com/scl/fi/g7hqww2xtzq33woy9f81o/Exit-to-Oregon-Country-Fair.mp4?rlkey=lmj5qras665fv6rs45r5bzu42&st=5lh9jytx&dl=0>

Exit from OCF (Aero Rd.) Pt.2

<https://www.dropbox.com/scl/fi/8nks1neg1trny16n1gdns/Exit-of-Oregon-Country-Fair.mp4?rlkey=1sa8dahw4h3lalv1arshtd5ce&st=qo5m4hbo&dl=0>

2 Historical Data Integration

Since our last communication, we have received detailed hourly ridership data from prior years. We have incorporated that information into a demand-based capacity model.

For planning purposes, we are using **2025 ridership levels as the baseline**, as that represents the most current and complete dataset.

Rather than sizing service based on fixed assumptions, we are modeling:

- Hour-by-hour boarding patterns
- Morning vs afternoon flow imbalance
- Peak 4–8 PM exit windows
- Realistic cycle times based on field validation

This allows us to right-size fleet deployment by day and by time window, while still building in appropriate buffers.

3 Demand-Responsive Structure

We are structuring the proposal to allow:

- Addition of capacity with as little as 48-hour notice
- Scaling based on actual booking data
- Operational flexibility by day

Our goal is to ensure service reliability while keeping the operation efficient and cost-conscious.

We are pleased to reaffirm that we will deliver to OCF a fully dedicated, seated, air-conditioned coach fleet at a total cost that is below what OCF has paid in recent years for standard transit service.

We remain on track to submit our full proposal on **Wednesday, 02/25**, as planned.

Best regards,
Sophia

From: Pronto Journeys <cs@prontojourneys.com>

Sent: Wednesday, February 18, 2026 11:22 PM

To: kbolton@oregoncountryfair.org

Cc: Pronto Affiliates <affiliates@prontojourneys.com>; Kumar Shah <kumar@prontojourneys.com>

Subject: RE: OCF 2026 Shuttle Planning – Budget Alignment & Operational Inputs

Dear Karen,

We also want to let you know that we have had extensive discussions with Bret @ LDT to learn about their experience and operating history with the shuttle service. Bret has been immensely helpful.

Our affiliate partner in Eugene is quite familiar with OCF. We will be doing a ‘dry run’ of the Eugene to OCF route in a motor coach shortly and will gather all the data and input to develop a comprehensive plan for the shuttle operation. We will share with you our findings.

We want to make sure you get the full benefit of the extensive modeling we have done for the shuttle service / operation, and combine it with our own experience in operating the shuttle / route and all the intricacies which you and Bret and others have shared with us.

We are looking forward to sharing our proposal with you next week.

Best regards,
Sophia

From: Pronto Journeys <cs@prontojourneys.com>

Sent: Wednesday, February 18, 2026 11:01 PM

To: kbolton@oregoncountryfair.org

Cc: Pronto Journeys <cs@prontojourneys.com>; Pronto Affiliates <affiliates@prontojourneys.com>; Kumar Shah

<kumar@prontojourneys.com>

Subject: OCF 2026 Shuttle Planning – Budget Alignment & Operational Inputs

Dear Kirsten,

We are delighted to reconnect with you. We have completed the modeling and planning for the shuttle service operation for OCF. The model is flexible with variables which will be completely in and under your and your team's control.

Before getting into planning details, I want to address what I know is your primary concern — cost.

Based on the modeling we have completed using historical shuttle volumes and operating patterns, we are confident that:

We will deliver a fully dedicated, seated, air-conditioned coach fleet at a total cost that is below what OCF has paid in recent years for standard transit service. Your input on projections and shuttle service operation could result in a substantially reduced cost structure compared to what you have paid over the past 3 years.

What we will deliver to you:

- No increase in budget exposure with the potential to reduce your cost substantially
- No compromise on capacity
- A materially improved rider experience

We have the numbers to back up our assertions which we will share with you in our proposal.

Rider Experience – A Meaningful Upgrade

The difference for the riders will be like between **night** and **day**:

Under the transit model:

- ~35 seated positions on articulated buses
- Remaining riders standing – shoulder-to-shoulder in sweltering heat
- Mad dash to storm the doors to secure seats upon boarding with 2/3rds of the riders facing disappointment of not finding a seat for the long '20-30 minute' ride

Under our proposed model:

- 55 seats per coach
- Every rider seated
- Air-conditioned touring coaches
- No standing loads
- Controlled boarding environment

For a 20–30 minute ride in July, at the beginning of the day and especially at the end of a long day, that difference is not cosmetic — it would set the right tone for their experience in the morning and leave them with a relaxing and pleasant memory of their day at OCF.

Our goal is to make the transportation component feel orderly, comfortable, and predictable. With a **local, Eugene-based affiliate**, who is well known, has excellent reputation and is intimately familiar with Eugene, we are confident that the OCF attendees will be served exceedingly well.

Now – Planning Inputs We Need From You

We have completed baseline modeling internally and have developed three (3) scenarios for required capacity. To finalize deployment levels and pricing precision, we need alignment on a few key variables:

1 Ridership Baseline

Should we model 2026 closer to:

- 2023 ridership levels – **18,022** - or 2025 levels – **12,230**

The difference materially affects daily fleet sizing.

We also propose making the operation demand-responsive by day based on actual bookings. To do that:

- How frequently can we receive ticket sales updates?
- When would you want fleet levels finalized?

The good news is we can revise our plan all the way through Mid June with the ability to add more capacity with just 48-hour notice.

2 Upload / Download Objective

The biggest cost driver is the time window allocated for peak loading and unloading.

We have modeled:

- ~4-hour cycle (similar to prior years)
- ~3-hour cycle
- ~2-hour accelerated flow

Each scenario changes total bus count and cost.

What is your guidance for us for 2026?

3 Optional Access Considerations

Eugene/Springfield will remain core. However, we need your input on:

- Shuttle for Amtrak synced with Amtrak arrivals and departures
- Potential demand from Corvallis, Portland and other cities
- Known geographic concentrations of ticket buyers

We are not assuming expansion — only ensuring we plan intelligently. We have sufficient time to plan the routes, schedules based on historical data. The benefit of setting up separate routes / schedules is we can peel off those

riders from the ones from Eugene, which will further reduce the congestion at peak times and consequently reduce the wait times for the riders.

From our end – we know we can deliver this to you in 2026. Based on your input and guidance, we can defer this to next year or beyond.

Dedicated Fleet Advantage

Unlike prior years where buses were shared with regular transit operations and hence not available on certain days at certain times – which creates constraints which are beyond your control - our fleet would be fully dedicated to OCF for the duration of the event – under your and your team’s full, exclusive, and sole control.

That means:

- No competing service constraints and no trade-offs
- Ability to upsize or downsize fleet levels up to three weeks prior and to add more capacity with 48-hour notice
- Predictable capacity allocation based on our detailed models
- Complete operational control for you and your team

If you can provide guidance on the above by Monday, we will incorporate it and deliver a finalized proposal by Wednesday, 02/25.

What we will deliver to you:

- Luxurious / comfortable / premium / first class experience to your fans at a substantially reduced cost
- Vastly superior rider comfort and experience compared to the transit experience – difference of ‘day’ and ‘night’
- Deliver to you a turnkey solution with knobs and levers which are totally under your control – as opposed to transit which is not within your sphere or span of control.

We look forward to your input, which would be valuable in helping us apply the right levers to build the plan for you. I know this is a big ask. If you are not able to respond in the suggested time frame, don’t worry about it. We will share with you a few scenarios in our proposal and you will get to pick the one that feels right to you or one that we can further customize for you.

Best regards,
Sophia



From: Kumar Shah <kumar@prontojourneys.com>
Sent: Monday, February 16, 2026 10:06 PM
To: kbolton@oregoncountryfair.org
Cc: Pronto Journeys <cs@prontojourneys.com>
Subject: RE: OCF Shuttle Services - Update

Dear Kirsten,

Thank you for your note.

We look forward to continuing to learn more about OCF. We have already learned and absorbed a great deal about your operational model, priorities, and values, and we approach every engagement with the understanding that the learning process never stops.

Please be assured that our proposal will meet **all** of your stated operational requirements — including capacity, ADA compliance, air conditioning, and event-day execution standards. At the same time, we are confident we can deliver additional value in terms of comfort, flexibility, and demand-responsive deployment that enhances the overall experience without altering OCF's operating philosophy.

We recognize you may be evaluating other options as well. We welcome that. We simply ask that you review our proposal once submitted. We are confident you will find it thoughtful, disciplined, and aligned with your needs and your vision.

We will be in touch before the end of the week with the formal quote.

Respectfully,
Kumar

From: kbolton@oregoncountryfair.org <kbolton@oregoncountryfair.org>
Sent: Monday, February 16, 2026 12:13 PM
To: Kumar Shah <kumar@prontojourneys.com>
Cc: Pronto Journeys <cs@prontojourneys.com>
Subject: RE: OCF Shuttle Services - Update

You still don't understand OCF. We will never be a 100k visitor event. We don't charge riders to ride the bus. Your buses are too small. We require 120 persons per bus, all buses must be ADA compliant and air conditioned. You don't own the buses you want to rent to us, you are subleasing them and any damage to them will be at your expense.

Please send your quote and we will review and determine if you meet our requirements. I doubt your price will fall within our budget and we will decline your proposal and then there will be no bus service to OCF.

Have a nice day,

Kirsten Bolton
Executive Director
Oregon Country Fair
442 Lawrence St.
Cell#541-321-6626



From: Kumar Shah <kumar@prontojourneys.com>
Sent: Monday, February 16, 2026 11:51 AM
To: kbolton@oregoncountryfair.org
Cc: Pronto Journeys <cs@prontojourneys.com>
Subject: OCF Shuttle Services - Update

Dear Kirsten,

I hope you are doing well and that preparations for OCF 2026 are progressing smoothly.

As promised, I wanted to provide you with a thoughtful update on where we stand and how we are approaching this.

What We've Learned:

- We have received, reviewed and analyzed all the documents and records shared with us by Lane Transit District (LTD) for the services they provided for OCF for the past several years. Here is a summary of what we have learned about the shuttle services
 - ~25% of the OCF participants take the shuttle from Eugene
 - 11,518 boardings in 2022 / ~45,000 attendees
 - LTD was paid for # of boardings through 2023 and for # of hours starting 2024
 - LTD provided ~20 buses
 - Amounts paid to LTD:
 - \$127,172 in 2024
 - \$123,301 in 2025
- We have reviewed OCF's 990's filed with the IRS for prior years

Where We Stand Operationally

- Identified more than forty (40) 55-Passenger buses for OCF
- Access to even a larger pool of buses and motorcoaches – if needed
- Dedicated on-site operations supervisor for all three days
- Pricing model aligned with – and potentially improve upon – prior years' cost structure

Our goal is to provide stability, clarity and operational strength and a smooth transition.

Pronto Journeys : Our Operating History, Experience and our Journey

We have been operating large scale shuttle services for more than 15 years:

- **San Francisco 49ers home games:**
 - Fan shuttle service from more than 20 cities to the stadium

- Employees shuttle services for all the employees working at the stadium on game day
- **University of California Berkeley football games** : Fan shuttle service from local transit service locations and from Amtrak station
- **Paul McCartney concert**
- **JayZ and Justin Timberlake concert**
- **President's Cup Golf, Harding Park, San Francisco CA**

Expand the OCF presence through On-line Booking:

Besides group and shuttle transportation services, one other core competency of ours is helping clients establish their online shuttle and transportation service booking portals.

- **ProntoExperiences.com** : Featuring more than 150,000 experiences across more than 6,000 exciting destinations worldwide
- **ProntoJourneys.com** : Online booking for group and student transportation services for groups of any size for any occasion, anytime, anywhere, nationwide
- **49ers shuttles**: Online booking of individual seats from 20+ cities to the Stadium

Based on our 15+ years of operating experience and hundreds of large scale events we can confidently say that we will be able to successfully operate the shuttle service for OCF for 2026 and beyond. Much like we have done with all these contracts, we look forward to working with you and invest in OCF on a multi-year basis.

We would love to feature OCF on ProntoExperiences.com. Just like **Renaissance Faire** - <https://norcalrenfaire.com/> - in the San Francisco Bay Area draws 150,000+ people annually, you have created an event in Oregon that has struck a chord with tens to hundreds of thousands of people. Growing the attendance to 100,000 to 150,000 is well within the realm of possibilities and we assure you we will be there with you every step of the way to make it happen.

Over the years, we have created and developed a loyalty program that our clients love. We can easily extend / include OCF in that program and make the loyalty program – reward points – available to all OCF attendees even as soon as the 2026 event.

We are looking forward to building a partnership that expands and enriches the experience for all the attendees.

The Pronto Approach:

Here are the differences you will see between our approach vs what you have seen with LTD:

1 Unconstrained Capacity

- Transit agencies operate within fleet and labor constraints. We are not limited to a fixed fleet. If demand exceeds expectations, we can scale up with a few hours / a day's notice.
- LTD operates just one type of equipment. With Pronto, you will have access to a variety of vehicles, including but not limited to:
 - 55-Passenger Luxury Motorcoaches
 - 40-45, 25-27 Passenger Shuttle Buses
 - Sprinters
 - Vans

2 Geographic Optionality (When and If you choose)

This is not about growth for growth's sake.

It is about removing structural constraints.

With LTD, service is inherently tied to their geographic footprint.

With Pronto, OCF is not limited to a single corridor.

If at any point — whether in 2026 or five years from now — OCF decides it would like to:

- Add pickup points elsewhere in Eugene
- Include Springfield
- Offer limited service from Corvallis
- Provide capped express access from Portland

You will be able to do so without regulatory or fleet limitations.

There is no obligation to expand.

There is simply no ceiling imposed on you.

Events similar in spirit — such as the **Northern California Renaissance Faire** — draw from a wide regional audience not because of aggressive expansion, but because transportation access makes participation easier and more sustainable.

OCF has built something culturally meaningful. Our role is simply to ensure that geography never becomes a barrier should you ever wish to broaden access.

- With Pronto, you are not limited to just those locations / stops that are served by LTD. We can schedule / set up shuttle services from other locations in Eugene and other neighboring cities and towns of your choosing
- Pickups from other cities: Should you wish to reach out to fans / patrons from neighboring cities:
 - **Eugene** – other locations : Population – 177,000 / 13 miles
 - **Springfield** – Population : 62,000 / 17 miles
 - **Corvallis** - Population : 60,000 / 17 miles
 - **Albany** - Population : 57,000 / 57 miles
 - **Salem** - Population : 177,000 / 80 miles
 - **Portland** - Population - 635,000 (2.5M metro area) / 110 miles
- Additional Services we can offer:
 - Core Shuttle Service – Eugene / Springfield
 - Secondary Shuttle Service – Corvallis
 - Premium Express Service – Albany, Salem
 - Portland Express Service: Strong Cultural / Arts demographic match for OCF
 - 4-6 luxury coaches
 - 1 round-trip per day

These additional services would be scheduled based on demand with more capacity added as / when needed. We can cap the demand by limiting the supply of seats on these shuttles / express service routes.

These additional locations / cities will give people in other cities an opportunity to participate in OCF and could potentially grow your fan base substantially. It will also reduce parking pressure, lower emissions, and give patrons cleaner transportation options from where they actually live.

3 Demand Visibility

- Pre-purchased shuttle access
- Trackable QR codes
- Real-time usage monitoring
- Precise rider counts by day and time

This will give you and your team visibility you have never had before regarding actual usage patterns.

4 Enhanced Rider Experience

- Comfortable 55-seat motorcoaches
- Air-conditioned, touring-grade equipment
- Optional OCF-produced welcome video content and programming onboard

A Necessary Clarification:

I want to address something directly, but respectfully.

Under the FTA Charter Rule, once a willing and able private charter provider has responded affirmatively, the transit agency option is no longer available for direct operation of the charter service. That is not a discretionary matter for OCF or LTD – it is subject to the Federal Laws.

Our intent is not to create hardship for OCF. Quite the opposite — we want to ensure continuity, compliance, and operational excellence.

In one of the communications we reviewed, there was discussion suggesting that if tree pruning was not pursued, we would withdraw. That framing is not constructive for OCF. The Fair deserves a transportation partner that works collaboratively toward solutions rather than positioning operational constraints as leverage.

We are prepared to solve site constraints through proper routing analysis and vehicle selection — not by asking OCF to alter its stewardship of the Land.

OCF – Pronto Partnership:

I know you have not had the opportunity to work with us, but through our interaction and this email with our thoughts and ideas you have a better understanding of who we are and how we operate. We approach each and every client – like OCF – in the spirit of building a long-term and mutually beneficial partnership.

Proposed Next Steps:

I suggest:

1. A working call this week to align on structure.
2. Drafting an agreement that outlines:
 - Scope of service
 - Preliminary fleet assumptions

- Pricing framework
- Risk allocation
- Site visit coordination

We can draft the agreement if you'd like – or be happy to review your draft

3. Site visit in early March to finalize routing, staging and plan for the entire event.

Kirsten, I recognize that this is different from what OCF has historically done. Change is uncomfortable — particularly when it intersects with federal regulation.

However, if we approach this thoughtfully, this transition to Pronto will result in:

- Full compliance with the Federal Laws
- A right-sized, efficient operation
- Stable cost alignment
- And more scalable for future years – we will take you as far as you / your team are willing to go – unconstrained and unrestrained

We are prepared to move forward constructively and collaboratively.

Please let me know your availability for a call this week. We are looking forward to it.

Respectfully,

Kumar Shah

President & CEO

Accelar, Inc. dba Pronto Journeys

FTA Charter Registration ID: 6643



From: Kumar Shah

Sent: Thursday, January 22, 2026 3:12 PM

To: 'kbolton@oregoncountryfair.org' <kbolton@oregoncountryfair.org>

Cc: Pronto Journeys <cs@prontojourneys.com>

Subject: Follow-Up and Next Steps re: OCF Shuttle Service

Dear Kirsten,

Thank you for your candid response and for taking the time to clearly outline Oregon Country Fair's perspective and boundaries. I appreciate the clarity.

I want to be equally clear and reassuring on our end. We fully understand that OCF does not accept partners or sponsors, that you are not seeking marketing support, and that any transportation provider would be engaged strictly as a **vendor**. We also understand the site conditions, cost sensitivities, and the importance of ensuring that shuttle service remains reliable and uninterrupted for the community and fairgoers.

As I shared earlier, our current focus is simply on **doing our due diligence** — understanding the historical operating parameters, site constraints, and cost structure so that we can determine whether there is a **practical, compliant, and responsible way** for us to support OCF without creating risk or disruption for the event.

We are actively working through that analysis now. As promised, once we have completed this work and have a concrete plan to share, **we will reach out to you** so you can review it and decide whether it is worth any further discussion. Until then, we are not asking OCF to make any decisions or commitments.

Thank you again for the transparency and for the work you do in stewarding an event that clearly means a great deal to the community.

Best regards,
Kumar



From: kbolton@oregoncountryfair.org <kbolton@oregoncountryfair.org>

Sent: Wednesday, January 21, 2026 9:14 AM

To: Kumar Shah <kumar@prontojourneys.com>

Cc: Pronto Journeys <cs@prontojourneys.com>

Subject: RE: 2026 Oregon Country Fair

Greetings, Kumar,

Thank you for the update. A few things you should know about Oregon Country Fair. We do not take partners or sponsors for our event. In 56 years of operation, we have never accepted partners or sponsors. We reject Corporate America and promote alternative lifestyles, like being a farmer or artist. We do not need your marketing assistance. We have an in-house marketing department comprised of volunteers that donate their time in support of our mission. We also have an employee dedicated to our marketing and advertising.

If your bid comes in higher than LTD, we will reject it and then we will not have bus service for our event. This will harm our event and local community as it will cause greater congestion around our event, increase carbon emissions and harm the local community of Veneta. You will not be allowed to promote yourself as a partner or sponsor of our event. You would be a vendor, like all the other vendors we work with to put on our event. Any damage to your buses due to collision with our trees will be at your own expense. Any damage

you do to our trees will be charged to your organization. I highly encourage you to consider all of this and evaluate whether the time and energy you are putting into bidding on our event could be for nothing.

Have a nice day,

Kirsten Bolton
Executive Director
Oregon Country Fair
442 Lawrence St.
Cell#541-321-6626
Office#541-343-4298



From: Kumar Shah <kumar@prontojourneys.com>
Sent: Wednesday, January 21, 2026 8:11 AM
To: kbolton@oregoncountryfair.org
Cc: Pronto Journeys <cs@prontojourneys.com>
Subject: RE: 2026 Oregon Country Fair

Greetings, Kirsten.

Hope your new year is off to a great start and the plan for OCF are coming together well.

Just want to give you an update on our end. As previously shared, we reached out to Lane Transit District soon after we talked to gather all the historical data and information related to the event. We received the first production of the records earlier in the week. The Lane Transit Finance and Operations teams are working on compiling additional information for us. We have also approved and initiated the payment for production of more detailed information. We expect the bulk of the data to be available to us in the next 2 weeks to allow us to move forward with the submission of our proposal to you soon thereafter.

Our operations team is also working on the logistics for your event. We expect to have those details to be worked out in the near future for successful execution of our plan for your event.

I have also given our marketing team a heads up on your event. They are looking forward to collaborating with you and your marketing team to build broader awareness of your fabulous event and boost the attendance. We also have some ideas on getting some of our affiliates involved in the event as sponsors / partners as well.

Looking forward to connecting with you in a couple of weeks.

Best regards,
Kumar



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★★★★★

Kumar Shah, President
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Kumar@ProntoJourneys.com
84 W Santa Clara St, Ste 700
San Jose, CA 95113



From: kbolton@oregoncountryfair.org <kbolton@oregoncountryfair.org>
Sent: Friday, January 9, 2026 9:31 AM
To: Kumar Shah <kumar@prontojourneys.com>
Cc: Pronto Journeys <cs@prontojourneys.com>
Subject: RE: 2026 Oregon Country Fair

Thank you, Kumar. I look forward to hearing from you in the next few weeks.

Kirsten Bolton
 Executive Director
 Oregon Country Fair
 442 Lawrence St.
 Cell#541-321-6626
 Office#541-343-4298



From: Kumar Shah <kumar@prontojourneys.com>
Sent: Thursday, January 8, 2026 2:57 PM
To: kbolton@oregoncountryfair.org
Cc: Pronto Journeys <cs@prontojourneys.com>
Subject: RE: 2026 Oregon Country Fair

Dear Kristen,

Thank you again for taking the time to speak earlier today. I appreciate you sharing your perspective candidly, and I want to reiterate that our intent is **not** to put the Oregon Country Fair in a difficult position or to jeopardize shuttle access for fairgoers.

I understand your concerns regarding site access, operating conditions in a forested environment, cost sensitivity given OCF's nonprofit mission, and the importance of ensuring that the shuttle service remains reliable and uninterrupted. Those are all legitimate considerations, and they are exactly the types of issues we evaluate carefully when planning special-event transportation.

At this stage, we are **not asking OCF to make any immediate decisions**, nor are we asking you to commit to a particular operator. We are simply completing our due diligence by reviewing historical operating records and service parameters so that we can better understand what has worked in the past and whether there are practical ways to improve or replicate that service using private charter resources.

Our goal is to determine whether there is a **compliant, operationally viable, and cost-conscious path forward** that works for OCF — not to create disruption or uncertainty. If, after completing that review, it becomes clear that no such path exists, we will take that into account before making any further decisions.

In the meantime, please know that we value OCF's mission and the importance of this event to the community, and we will continue to approach this thoughtfully and in good faith. I would welcome the opportunity to reconnect once we have had a chance to review the historical information – which we have formally / officially requested already - and discuss options calmly and collaboratively.

Thank you again for your openness and for the work you do in organizing the Fair. Please don't hesitate to contact me if there's anything else you need from us.

Warm regards,
Kumar



From: kbolton@oregoncountryfair.org <kbolton@oregoncountryfair.org>

Sent: Monday, January 5, 2026 12:44 PM

To: Kumar Shah <kumar@prontojourneys.com>

Cc: Pronto Journeys <cs@prontojourneys.com>

Subject: RE: 2026 Oregon Country Fair

Thanks Kumar! See you Thursday at 11am.

Kirsten Bolton
Executive Director
Oregon Country Fair
442 Lawrence St.
Cell#541-321-6626
Office#541-343-4298



From: Kumar Shah <kumar@prontojourneys.com>

Sent: Monday, January 5, 2026 12:04 PM

To: kbolton@oregoncountryfair.org

Cc: Pronto Journeys <cs@prontojourneys.com>

Subject: RE: 2026 Oregon Country Fair

Hi Kirsten,

Happy 2026!! Hope you had a wonderful holiday.

We have scheduled the call on Thursday @ 11 am Pacific. The meeting invitation has been sent to you.

Best regards,
Kumar

From: kbolton@oregoncountryfair.org <kbolton@oregoncountryfair.org>

Sent: Monday, January 5, 2026 9:10 AM

To: Kumar Shah <kumar@prontojourneys.com>

Cc: Pronto Journeys <cs@prontojourneys.com>

Subject: RE: 2026 Oregon Country Fair

Hi Kumar,

Sorry for the delay in responding. I am available for a meeting tomorrow or Thursday. Let me know what time works best for you.

Have a great day,

Kirsten Bolton
Executive Director
Oregon Country Fair
442 Lawrence St.
Cell#541-321-6626
Office#541-343-4298



From: Kumar Shah <kumar@prontojourneys.com>
Sent: Tuesday, December 30, 2025 9:24 PM
To: kbolton@oregoncountryfair.org
Cc: Kumar Shah <kumar@prontojourneys.com>; Pronto Journeys <cs@prontojourneys.com>
Subject: RE: 2026 Oregon Country Fair
Importance: High

Hi Kristen,

Good to e-meet you. I received your email below and your v-mail from earlier today.

Below is the email I had sent to you on 12/26. Just want to make sure you have received this email. You are in great hands with us / Pronto. We will take care of all the requirements for the Oregon Country Fair. Once we have a comprehensive understanding of your needs, we will work out the logistics and scheduling for the OCF and share with you and your team all the details.

I am traveling overseas and will be returning to the US on 01/03/2026. May I suggest we schedule a call on Tuesday, 01/05? I am available between 11 am and 1 pm Pacific Time. Let me know what works best for you.

Best regards,
Kumar

Dear Kristen,

I am writing on behalf of **Pronto Journeys**, a **registered private charter transportation provider (FTA Charter Registration ID: 6643)**, regarding shuttle transportation services for the **2026 Oregon Country Fair**, scheduled for **July 10–12, 2026**.

Lane Transit District recently issued a charter service notice under **49 CFR Part 604.14**, seeking to determine whether any registered private charter providers were willing and able to provide shuttle service between designated park-and-ride locations and the fair venue. Pronto has **formally responded confirming that we are willing and able to provide the full scope of services described** in that notice.

Under the **Federal Transit Administration's Charter Service Rule**, when a registered private charter provider affirms its willingness and ability to provide the service, a public transit agency such as Lane Transit District **may not directly provide the charter service**. In such circumstances, the service must be provided by a private charter operator.

Who We Are: Pronto Journeys

Pronto Journeys brings more than **20 years of continuous operating history** delivering charter, shuttle, and special-event transportation across the United States. Over that period, Pronto and its affiliates have:

- Operated **60K+ charter trips**
- Transported **2.5M+** across school, university, corporate, sports, and public events
- Built a nationwide affiliate network of **6,700+ licensed, insured charter operators**

- Supported **large, multi-day, high-frequency events** requiring ADA accessibility, precise scheduling, and complex site logistics

Our experience includes **major professional sports and special-event shuttle operations**, including long-running shuttle programs supporting **NFL games and large events at Levi's Stadium, 49ers home games under a 4-year contract with San Francisco 49ers**, as well as college athletics, festivals, conventions, and civic events.

Safety and compliance are foundational to our operations. We work exclusively with operators that meet strict licensing, insurance, and safety requirements, and we maintain a strong operational safety record across our network.

What Makes Pronto Different: Our Click-and-Mortar Model:

Pronto operates a **"click-and-mortar" transportation model**, combining:

- **On-the-ground operational expertise** (fleet sourcing, dispatch, ground crews, site management), and
- A **modern, cloud-based booking and operations platform** purpose-built for group and event transportation

This hybrid / integrated approach allows Pronto to deliver the reliability of a traditional operator with the scalability, transparency, and efficiency of a technology platform.

Our Cloud-Based Platform — "Uber for Groups"

Pronto's online, cloud-based booking portal is often described as **"Uber for Groups"**. It provides:

- Centralized trip planning, booking, and dispatch
- Real-time visibility into fleet deployment and capacity
- Automated coordination across multiple operators and vehicle types
- Transparent pricing and service specifications
- A single system of record for planning, operations, and reporting

For events like the Oregon Country Fair, this means **better planning, fewer surprises, and real-time operational control** throughout the event.

What OCF Will Experience with Pronto (vs. Traditional Transit)

While remaining fully compliant with all federal charter service requirements, Pronto delivers a purpose-built event transportation model that differs materially from traditional public transit operations:

- **Single point of accountability** — one entity responsible for planning, execution, safety, and performance
- **Event-specific service design**, tailored to attendance patterns rather than fixed-route assumptions
- **Dedicated ADA-accessible fleet planning**, not shared with daily route service
- **On-site ground operations teams** managing loading, unloading, queue flow, and accessibility assistance

- **Real-time command and control**, enabling rapid response to demand surges, weather, or disruptions
- **Direct coordination with event staff, traffic control, and local authorities**
- **A clear, guest-friendly rider experience**, including wayfinding, signage, staffing, and communications

Capacity Resiliency & Coordination with LTD

To ensure service continuity under all conditions, Pronto's operating plan allows that **in the unlikely event aggregate private charter capacity is fully utilized**, Pronto may **supplement capacity by leasing buses and/or drivers from Lane Transit District**, under **Pronto's operational direction and control**. Any such supplemental arrangements would remain fully compliant with **FTA charter service requirements**, with Pronto serving as the charter service provider of record.

We welcome the opportunity to coordinate directly with Oregon Country Fair staff and schedule an online Zoom session to discuss service planning, logistics, and next steps, and to tailor the shuttle operation to OCF's unique site conditions, sustainability goals, and attendee experience.

Thank you for your time and for your commitment to providing safe, accessible, and environmentally responsible transportation options for fairgoers.

Warm regards,
Kumar Shah

Kumar Shah
President & CEO
Accelar, Inc. dba Pronto Journeys
84 W Santa Clara St
Suite 700
San Jose, CA 95113
kumar@accelar.com
650.249.7418 (w)
408.472.5662 (mobile)



[Scan me to watch me in action](#)



Pronto Journeys
Safe. Dependable. Comfortable.

Group Transportation since 2005
60K+ Trips. 2.4M+ Passengers.
100% Injury-free

RATING: 4.93 / 5.0
★★★★★

Kumar Shah, President
+1-650-249-7418
Kumar@ProntoJourneys.com
84 W Santa Clara St, Ste 700
San Jose, CA 95113



From: kbolton@oregoncountryfair.org <kbolton@oregoncountryfair.org>

Sent: Tuesday, December 30, 2025 11:35 AM

To: kumar accelar.com <kumar@accelar.com>

Subject: 2026 Oregon Country Fair

Hello Kumar,

Lane Transit District (LTD) forwarded me your response to the Oregon Country Fair Charter posting. Please call me at your earliest convenience to discuss. LTD does not negotiate the charter service on our behalf, so we need to discuss your ability to meet our requirements.

Happy New Year!

Kirsten Bolton
Executive Director
Oregon Country Fair
442 Lawrence St.
Cell#541-321-6626
Office#541-343-4298



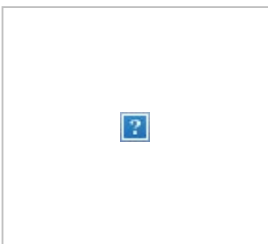
Exhibit C.1

From: kbolton@oregoncountryfair.org
To: [Bret Smith](#)
Cc: [Heather Lindsay](#); [Eric Breitenstein](#)
Subject: RE: [External Sender]Quote #14465-0 from Starline Luxury Coaches
Date: Monday, December 29, 2025 1:21:30 PM
Attachments: [image001.png](#)

Just spoke with Hollie with Starline and they will be withdrawing their bid.

Happy New Year!

Kirsten Bolton
Executive Director
Oregon Country Fair
442 Lawrence St.
Cell#541-321-6626
Office#541-343-4298



From: Bret Smith <Bret.Smith@ltd.org>
Sent: Monday, December 29, 2025 9:47 AM
To: kbolton@oregoncountryfair.org
Cc: Heather Lindsay <Heather.Lindsay@ltd.org>; Eric Breitenstein <Eric.Breitenstein@ltd.org>
Subject: RE: [External Sender]Quote #14465-0 from Starline Luxury Coaches

I have another one that came in I will send you a bit later today. This one is way more formal and they seem to really know the FTA rules. I having it reviewed before I respond to it.

Thanks,
Bret

From: kbolton@oregoncountryfair.org <kbolton@oregoncountryfair.org>
Sent: Monday, December 29, 2025 9:42 AM
To: Bret Smith <Bret.Smith@ltd.org>
Cc: Heather Lindsay <Heather.Lindsay@ltd.org>; Eric Breitenstein <Eric.Breitenstein@ltd.org>
Subject: RE: [External Sender]Quote #14465-0 from Starline Luxury Coaches

Thanks Bret. I will reach out to them.

Kirsten Bolton
Executive Director
Oregon Country Fair
442 Lawrence St.
Cell#541-321-6626

Office#541-343-4298



From: Bret Smith <Bret.Smith@ltd.org>
Sent: Wednesday, December 24, 2025 11:43 AM
To: kbolton@oregoncountryfair.org
Cc: Heather Lindsay <Heather.Lindsay@ltd.org>; Eric Breitenstein <Eric.Breitenstein@ltd.org>
Subject: FW: [External Sender]Quote #14465-0 from Starline Luxury Coaches

Kirsten,

I received this quote from Starline. Since they showed interest even though the quote does not really cover the posting needs you will need to get ahold of them to help them understand details of the event. With them showing interest we will need an email of retraction from them in order for LTD to provide the service. We ran into this with Starline when soliciting for Butte to Butte as well and Will had to actually call Hollie to negotiate and get them to send a letter of retraction of interest.

We have time if you want to wait for the 14 days to expire and see if anyone else shows interest. I suspect when they realize you will not be trimming trees to the height of a commercial coach and that they will not be able to turn around in the designated area at OCF I am guessing they will pull out.

If I get anymore reply's I will send them your way. Let me know if you need any help with this.

Hopefully you get some time to spend with family and friends over the Holidays,

Bret

Bret Smith

Lane Transit District
Senior Service Planner
P:541-682-6191 | F: 541- 682-6111
Contact us at ltd.org



From: hollie@starlinecollection.com <hollie@starlinecollection.com>
Sent: Wednesday, December 24, 2025 10:59 AM
To: Bret Smith <Bret.Smith@ltd.org>
Subject: [External Sender]Quote #14465-0 from Starline Luxury Coaches

Thank you for considering The Starline Collection for your upcoming trip. We look forward to earning your business. You can view your quote information at any time by clicking the View Quote Summary button included in this email. If you are ready to take the next steps to reserve

your trip, please do so by clicking the "Request This Quote" button below.

[Request Now](#)[View Quote Summary](#)[View Quote PDF](#)

Your quote is based on the information you provided and the inventory we had available at the time of the quote. Please note that changes to your itinerary may affect your quoted price. We honor quoted prices, subject to availability, for 30 days.

This is a quotation only, and we are not holding equipment for you at this time. The price offered and vehicles selected are subject to availability, and certain costs including parking, tolls and other direct travel expenses may not be included in the quoted price. If you need additional information or wish to confirm your reservation, feel free to call our office at +1 206-763-5817 during normal business hours.

All of us at The Starline Collection look forward to the opportunity to provide you with safe, comfortable, friendly service, and the modern, reliable, equipment that continually makes us the best in the business!

We look forward to serving you!



NOTICE OF FTA CHARTER SERVICE COMPLAINT

1. Complainant Information

Name: Kumar Shah

Title: President

Company: Pronto Journeys

FTA Charter Registration ID: 6643

Address: 84 W Santa Clara St, Suite 700, San Jose, CA 95113

Email: kumar@ProntoJourneys.com

Phone: 650.249.7418 (w) 408.472.5662 (Mobile)

2. Respondent Information

Agency: Lane Transit District (LTD)

Address: 3500 E 17th Avenue, Eugene, OR 97403

Primary Contact: Jameson Auten, CEO

Dave Roth, Director of Mobility Planning and Policy

Bret Smith, Senior Service Planner

Heather Lindsay

Eric Breitenstein

3. Description of the Complaint

This complaint arises under the Federal Transit Administration (FTA) Charter Service Rule (49 C.F.R. Part 604) in connection with the Oregon Country Fair (OCF) 2026 shuttle service.

Accelar, Inc. dba Pronto Journeys ("Pronto"), a registered charter provider, responded affirmatively to LTD's charter notice and engaged in good faith to develop and deliver a compliant and efficient shuttle service plan.

Despite Pronto meeting all requirements under 49 C.F.R. §604.8(a), LTD:

1. **Denied Pronto's request to lease vehicles and operators** under §604.8 without identifying any unmet regulatory condition;
2. **Failed to provide any substantive explanation** in response to follow-up requests for clarification;
3. **Engaged in conduct that interfered with the Charter Service process**, including influencing the client and positioning for Pronto's withdrawal; and
4. **Sought to provide the service directly under §604.9**, despite the presence of a qualified, willing, and able registered charter provider.

These actions collectively constitute violations of the Charter Service Rule and its underlying statutory framework.

4. Factual Basis

A. Charter Notice and Response

LTD issued a charter notice for the OCF shuttle service.

Pronto, a registered charter provider (ID 6643), responded affirmatively and in a timely manner.

B. Engagement and Operational Planning

Pronto:

- Engaged directly with OCF
 - Developed multiple service models
 - Explored private operator capacity (motorcoach, school bus, hybrid solutions)
-

Pronto Corporation

Pronto Group Transportation Network (GTN) - The Network Model for Group Transportation

84 W Santa Clara St, Suite 700, San Jose, CA

650.249.7400 | www.ProntoJourneys.com | www.ProntoExperiences.com

- Addressed all operational constraints communicated by OCF
-

C. Invocation of §604.8 Leasing

After exhausting private operator options under the constraints imposed by OCF, Pronto formally requested leasing of LTD vehicles and operators pursuant to §604.8.

Pronto satisfied all required conditions:

- Registered charter provider
 - Operates charter service
 - Received request exceeding capacity under constraints
 - Exhausted available private operators
-

D. LTD Denial Without Basis

On March 3, 2026, LTD denied Pronto's leasing request, stating only that it did not meet §604.8 requirements. LTD did not:

- Identify any specific condition not satisfied;
 - Provide factual support; or
 - Respond to subsequent requests for clarification.
-

E. Interference with Charter Process

LTD engaged in conduct that interfered with the Charter Service process, including:

- Advising the client that Pronto would likely withdraw under certain conditions;
 - Indicating to Pronto that it should notify LTD when it "decides to back down";
 - Communicating to the client that leasing would not be made available to Pronto.
-

F. Attempt to Invoke §604.9

LTD has asserted that it may provide the service directly.

However:

- Pronto responded to the charter notice
- Pronto engaged and developed plans
- Pronto remains ready, willing, and able

Accordingly, §604.9 is not applicable.

5. Violations of 49 C.F.R. Part 604

A. Improper Denial of §604.8 Leasing

LTD denied leasing without identifying any unmet condition under §604.8(a), effectively preventing a qualified provider from performing service.

B. Interference with Charter Service Process

LTD's conduct influenced the client and undermined the neutral administration of the charter process.

C. Improper Attempt to Provide Service Under §604.9

LTD seeks to provide charter service despite the presence of a qualified and responsive charter provider.

D. Inconsistent Application of Charter Rule

LTD's actions create a framework whereby a recipient may:

- Deny leasing;
-

- Declare a provider incapable; and
- Provide the service directly

This is inconsistent with the Charter Service Rule and 49 U.S.C. §5323(d).

6. Harm

LTD's actions have resulted in:

- Obstruction of a qualified charter provider;
 - Risk of unavailability of shuttle service for OCF attendees;
 - Distortion of the competitive process; and
 - Undermining of the Charter Service Rule.
-

7. Relief Requested

Pronto respectfully requests that FTA:

1. **Determine that LTD violated 49 C.F.R. Part 604**
 2. **Find that §604.9 is not applicable in this case**
 3. **Determine that LTD's denial of leasing under §604.8 was unsupported**
 4. **Direct LTD to comply with the Charter Service Rule in its handling of this matter**
 5. **Prohibit LTD from providing charter service for the OCF under §604.9**
 6. Grant such other relief as FTA deems appropriate
-

8. Supporting Documentation

Supporting documents are attached and include:

- Charter notice and response
 - Leasing request and LTD denial
 - Follow-up correspondence
 - Communications with OCF
 - Communications with private operators
 - Operational analysis
 - LTD advisory opinion submission
-

9. Certification

I certify that the information provided in this complaint is true and correct to the best of my knowledge.

Signed:



Kumar Shah
President, Pronto Journeys

Re: Lane Transit District-Request for Advisory Opinion Form and Request for EXPEDITED Advisory Opinion

From Charterservice Ombudsman (FTA) <ombudsman.charterservice@dot.gov>

Date Tue 2026-04-28 07:01

To Patrick Fiedler <Patrick.Fiedler@ltd.org>

Cc Kumar Shah <kumar@prontojourneys.com>; kbolton@oregoncountryfair.org <kbolton@oregoncountryfair.org>; hollie@starlinecollection.com <hollie@starlinecollection.com>; Carmen Jackson-Brown <Carmen.Jackson-Brown@ltd.org>; Miller, Micah (FTA) <micah.miller@dot.gov>; Lynch, John (FTA) <john.lynch@dot.gov>

Dear Mr. Fiedler:

Re: Advisory Opinion 2026-01

On April 7, 2026, Lane Transit District requested an Advisory Opinion from the Federal Transit Administration (FTA) on two issues: 1) the requirements for leasing a vehicle to a charter provider pursuant to 49 CFR 604.8, and 2) when a grantee may step in and provide charter service if a charter provider does not follow up on the initial notice of interest in 49 CFR 604.9. On April 13, 2026, Pronto Charter Service Company (Pronto) responded to the request for an Advisory Opinion claiming that LTD failed to provide adequate justification for its denial of Pronto's lease request and that LTD was therefore required to lease its vehicles to Pronto.

LTD's request for an advisory opinion is denied. **An advisory opinion is not necessary in this instance, as the questions asked are adequately covered by the charter regulations.** *See* 49 CFR 604.18(d)(3).

Background

The Oregon County Fair requested service for its 2026 fair, which occurs on July 10, 11, and 12. LTD desires to provide bus service for this event. LTD issued a notice pursuant to 49 C.F.R. § 604.14 for charter transportation services requested by the Oregon State Fair. Two registered charter services submitted a response; one registered charter provider, Pronto, expressed interest but subsequently determined it could not perform the service using its own equipment due to operational constraints and requested to lease LTD's vehicles and potentially operators under § 604.8. LTD denied Pronto's request to lease its vehicles. A second registered charter provider submitted a response to the Notice but failed to follow up with or contact the Oregon State Fair regarding the service.

LTD is seeking clarity regarding its ability to deny Pronto's lease request and its ability to step back in and provide the service. As noted above, 49 CFR § 604.8 and Q&A's in 49 CFR 604 Appendix C adequately address these questions.

49 CFR § 604.8 provides in pertinent part that:

(a) A recipient may lease its FTA funded equipment and drivers to registered charter providers for charter service only if the following conditions exist:

- (1) The private charter operator is registered on the FTA charter registration Web site;
- (2) The registered charter provider owns and operates buses or vans in a charter service business;

- (3) The registered charter provider received a request for charter service that exceeds its available capacity either of the number of vehicles operated by the registered charter provider or the number of accessible vehicles operated by the registered charter provider; and
- (4) The registered charter provider has exhausted all of the available vehicles of all registered charter providers in the recipient's geographic service area.

<https://www.transit.dot.gov/regulations-and-guidance/access/charter-bus-service/charter-bus-service-rule-and-guidance>

Since the regulations give the recipient discretion to lease a federally-funded asset to a private operator (or not), FTA is not implicated further in these decisions, nor can it require a recipient to lease its equipment to private operators. It is a local decision. Whether a recipient wishes to lease its vehicles to a private charter operator is entirely up to the recipient. **In other words, the regulations do not require a recipient to lease its vehicles to a private charter operator.**

As to the second question raised by LTD regarding when it may step back in and perform the service if a charter provider expresses interest. 49 CFR 604 Appendix C, question 49 addresses this scenario.

(49) Q: What happens if a registered charter provider indicates interest in providing the service, but then does not contact the customer?

A: A transit agency may step back in and provide the service if the registered charter provider was the only one to respond affirmatively to the notice.

<https://www.govinfo.gov/content/pkg/CFR-2011-title49-vol7/pdf/CFR-2011-title49-vol7-part604-appC.pdf>

In this instance, two charter providers responded to the initial notice for service. The first provider, Pronto, does not have the necessary vehicles to provide the service. The second provider never contacted the Oregon State Fair to discuss the terms of the service. Therefore, LTD is allowed to step back in and provide the service.

Sincerely,



Kathy Breeden
CHARTER OMBUDSMAN
Office of Chief Counsel
Federal Transit Administration
U.S. Department of Transportation
Ombudsman.Charterservice@dot.gov

On Tue, Apr 7, 2026 at 6:06 PM Patrick Fiedler <Patrick.Fiedler@ltd.org> wrote:

Lane Transit District hereby submits the attached **Request for Advisory Opinion Form and Request for Expedited Advisory Opinion Pursuant to 49 C.F.R. § 604.18**, concerning the application of 49 C.F.R. §§ 604.8 and 604.9 (Charter Services).

An original version of both documents has also been electronically filed under docket number FTA-2007-0023 at <http://www.regulations.gov>.

Please let us know if any additional information is required. Thank you for your consideration.

Patrick Fiedler

Compliance | Senior Paralegal

P: 541-682-3224



Disclaimer: This message, including any attachments, is confidential and may be legally privileged. It is intended solely for the designated recipient(s). If you are not the intended recipient, please notify the sender immediately and delete this message from your system. Any unauthorized access, use, disclosure, or distribution of this communication is strictly prohibited. Additionally, this email and any attachments do not constitute legal advice. I am not an attorney and cannot provide legal opinions or representation. Any statements made in this email should not be relied upon as legal guidance. Thank you.

Re: Request for Immediate Chief Counsel Review, Procedural Intervention, and Clarification – Oregon Country Fair Charter Service Complaint

From Charterservice Ombudsman (FTA) <ombudsman.charterservice@dot.gov>

Date Tue 2026-06-09 09:12

To Kumar Shah <kumar@prontojourneys.com>

Cc Cahill, Matthew (FTA) <matthew.cahill@dot.gov>; ftaregion10@dot.gov <ftaregion10@dot.gov>; FTARegion9 <ftaregion9@dot.gov>; Schiff_California@schiff.senate.gov <Schiff_California@schiff.senate.gov>; scheduling_padilla@padilla.senate.gov <scheduling_padilla@padilla.senate.gov>; OPL@dot.gov <OPL@dot.gov>; Transportation.RegulatoryInfo@dot.gov <Transportation.RegulatoryInfo@dot.gov>; Blair_Taylor@commerce.senate.gov <Blair_Taylor@commerce.senate.gov>; Tricia_Enright@commerce.senate.gov <Tricia_Enright@commerce.senate.gov>; Rob_Blumenthal@commerce.senate.gov <Rob_Blumenthal@commerce.senate.gov>; Miller, Micah (FTA) <micah.miller@dot.gov>; Lynch, John (FTA) <john.lynch@dot.gov>; AnStraus, Noah (FTA) <noah.anstrauss@dot.gov>; Jamie.Pfister@dot.gov <Jamie.Pfister@dot.gov>; Nifosi, Dana (FTA) <dana.nifosi@dot.gov>

Mr. Shah, Pursuant to 49 CFR Part 604, the Charter Ombudsman serves as the official liaison for Federal Transit Administration (FTA) leadership (cc'd on this, and previous, email(s)) and is authorized to speak on their behalf. To ensure regulatory compliance and consistent agency interpretation, all Charter Ombudsman responses are drafted and reviewed within FTA's Office of Chief Counsel. Our team has thoroughly evaluated and addressed your concerns. While we understand you may disagree with the final outcome, the FTA considers the Oregon County Fair matter closed. Thank you, Charter Ombudsman

On Fri, Jun 5, 2026 at 12:24 PM Kumar Shah <kumar@prontojourneys.com> wrote:

FTA Charter Ombudsman,

Thank you for your response.

However, I believe your response highlights the very concern that prompted my most recent filing.

My letter was not addressed to the Charter Ombudsman. It was addressed to Chief Counsel of the Federal Transit Administration, and copied to the Secretary of Transportation, FTA leadership, Congressional offices, and others because I no longer have confidence that the issues I have raised will receive fair, impartial, and comprehensive consideration through the Charter Ombudsman process.

To date, neither the Chief Counsel nor any other FTA leadership official has responded to my filing.

Instead, the Charter Ombudsman has once again responded on their behalf while leaving unanswered the central questions raised in my submission.

Most importantly, your response does not address the substance of my complaint regarding Lane Transit District (LTD).

Specifically:

- Pronto submitted an affirmative response to LTD's Charter Notice.
- Pronto never withdrew that response.

- Pronto repeatedly advised LTD, Oregon Country Fair, and FTA that it remained ready, willing, and able to provide the service.
- Pronto submitted multiple operating alternatives to Oregon Country Fair.
- Pronto's affirmative response to the Charter Notice remains active today.

Your response does not identify any authority under 49 U.S.C. § 5323(d) or 49 C.F.R. Part 604 that permits FTA, the Charter Ombudsman, or LTD to disregard an active response to a Charter Notice submitted by a registered charter provider.

Likewise, your response does not identify any authority permitting FTA to determine the viability of Pronto's proposal and, based on that determination, effectively remove Pronto from the Charter Rule process and to do with a complete misrepresentation of facts that Pronto is unable to perform the service when we have presented detailed documentation of our plans to perform the service.

Congress did not grant FTA or the Charter Ombudsman authority to substitute their judgment for that of the customer or the marketplace regarding the merits, viability, or competitiveness of a proposal submitted by a private charter operator.

Those decisions belong to the customer, provided the responding operator remains ready, willing, and able to perform the service.

Furthermore, Pronto's complaint challenged LTD's conduct, LTD's interference with the Charter Rule process, LTD's efforts to reclaim a service after issuing a Charter Notice, and FTA's authority to permit LTD to do so. None of those issues were addressed in either the January 20 correspondence or the April 28 response to LTD's advisory opinion request.

Accordingly, I respectfully disagree with your assertion that my complaint has been addressed.

The concerns raised in my filing to the Chief Counsel extend well beyond the LTD matter and include serious questions regarding the administration of the Charter Rule, the authority exercised by the Charter Ombudsman, the treatment of private operators under the Charter Rule process, and FTA's recent interpretations in the LTD, VTA, and SCCTD matters.

For those reasons, I continue to request a response from the Chief Counsel and FTA leadership.

Until such response is received, Pronto does not consider these matters resolved. We will not be engaging with the FTA Charter Ombudsman on the LTD, SCCTD, VTA and other matters we have already brought to your attention because we have no faith in your process and that they will receive fair, impartial, and comprehensive consideration through the Charter Ombudsman process.

Respectfully,

Kumar Shah
President & CEO
Pronto Corporation / Pronto Journeys
FTA Charter Registration ID: 6643

From: Charterservice Ombudsman (FTA) <ombudsman.charterservice@dot.gov>

Sent: Wednesday, June 03, 2026 06:54

To: Kumar Shah <kumar@prontojourneys.com>

Cc: Cahill, Matthew (FTA) <matthew.cahill@dot.gov>; ftaregion10@dot.gov <ftaregion10@dot.gov>; FTAREgion9 <ftaregion9@dot.gov>; Schiff_California@schiff.senate.gov <Schiff_California@schiff.senate.gov>; scheduling_padilla@padilla.senate.gov <scheduling_padilla@padilla.senate.gov>; OPL@dot.gov <OPL@dot.gov>; Transportation.RegulatoryInfo@dot.gov <Transportation.RegulatoryInfo@dot.gov>; Blair_Taylor@commerce.senate.gov <Blair_Taylor@commerce.senate.gov>; Tricia_Enright@commerce.senate.gov <Tricia_Enright@commerce.senate.gov>;

Rob_Blumenthal@commerce.senate.gov <Rob_Blumenthal@commerce.senate.gov>; Miller, Micah (FTA) <micah.miller@dot.gov>; Lynch, John (FTA) <john.lynch@dot.gov>; AnStraus, Noah (FTA) <noah.anstraus@dot.gov>

Subject: Re: Request for Immediate Chief Counsel Review, Procedural Intervention, and Clarification – Oregon Country Fair Charter Service Complaint

Dear Mr. Shah:

The substantive issues you raised have been addressed twice. We emailed you a response regarding the leasing "question" on January 20, 2026. We issued a second response on April 28, 2026 concerning Lane Transit's April 7 request for an Advisory Opinion (after you submitted your current complaint on April 26, 2026). As you note, you were copied on that email response, which explicitly covers the Oregon Country Fair Shuttle fact pattern. Although we thought it was clear pursuant to the timing of our Advisory Opinion response, we will make it abundantly clear now, because these previous responses answered the substantive portion of your complaint, pursuant to 49 CFR § 604.28(b), this matter requires no further action by the FTA.



Kathy Breeden
CHARTER OMBUDSMAN
Office of Chief Counsel
Federal Transit Administration
U.S. Department of Transportation
Ombudsman.Charterservice@dot.gov

On Mon, Jun 1, 2026 at 5:00 PM Kumar Shah <kumar@prontojourneys.com> wrote:

To: FTA Office of Chief Counsel

Cc: FTA Charter Ombudsman; FTA Region 10; Lane Transit District; Oregon Country Fair, VTA, FTA Region 9

Cc: Ron Wyden & Jeff Merkley (Oregon - US Senators)

Cc: Alex Padilla & Adam Schiff (California - US Senators)

Cc: Sean Duffy, Secretary, US Department of Transportation - Office of Public Liaison

Cc: US Committee on Commerce, Science and Transportation - Transportation Regulatory Affairs

Dear Chief Counsel / Matt Cahill,

Attached please find Pronto Corporation's Request for Immediate Chief Counsel Review, Procedural Intervention, and Clarification regarding our pending complaint against Lane Transit District under 49 C.F.R. Part 604.

As detailed in the attached filing, Pronto submitted a formal complaint on April 12, 2026. To date, we have not received acknowledgment, status information, or a substantive response regarding that complaint. In contrast, LTD's Request for Advisory Opinion received a substantive response from the Charter Ombudsman that effectively authorized LTD to proceed with the same charter service that is the subject of our complaint.

The Oregon Country Fair event is now less than sixty days away. As a practical matter, the value of the complaint process will be lost if these issues are not addressed before the service is implemented.

We respectfully request expedited review and written clarification regarding the issues identified in the attached filing, including the status of our complaint, the applicability of Appendix C Question 49, and LTD's authority to proceed while the complaint remains unresolved.

Thank you for your attention to this matter. We look forward to your response.

Respectfully,

Kumar Shah
President & CEO
Pronto Corporation / Pronto Journeys
FTA Charter Registration ID: 6643

From: Kumar Shah <kumar@prontojourneys.com>
Sent: Sunday, April 26, 2026 17:19
To: Charterservice, Ombudsman (FTA) <ombudsman.charterservice@dot.gov>
Cc: Eric.Breitenstein@ltd.org <Eric.Breitenstein@ltd.org>;
ftaregion10@dot.gov <ftaregion10@dot.gov>; Bret Smith <bret.smith@ltd.org>;
dave.roth@ltd.org <dave.roth@ltd.org>; 'Heather Lindsay' <heather.lindsay@ltd.org>;
kbolton@oregoncountryfair.org <kbolton@oregoncountryfair.org>;
patrick.fiedler@ltd.org <patrick.fiedler@ltd.org>;
jameson.auten@ltd.org <jameson.auten@ltd.org>
Subject: Emergency Request for Expedited Review and Preliminary Findings

To: Federal Transit Administration, Office of the Chief Counsel

In Re: Complaint against Lane Transit District (LTD) regarding Oregon Country Fair (OCF) Shuttle

Date: April 26, 2026

Complainant, Pronto Corporation ("Pronto"), hereby moves the Federal Transit Administration (FTA) for an **Emergency Expedited Review** of the pending complaint against Lane Transit District ("LTD"). This supplement provides evidence of a documented pattern of violations by Lane Transit District (LTD) and highlights "Bad Faith" actions currently being taken to interfere with a private operator's ability to provide service.

I. URGENCY AND IRREPARABLE HARM

The Oregon Country Fair (OCF) is scheduled to commence in approximately 80 days. A standard 75-day investigation period will effectively render this matter moot, as the operational window for securing vehicles, drivers, and logistics will close long before a final determination is reached. LTD is strategically utilizing this regulatory lag to manufacture a "service gap," pressuring the event organizer to abandon a private operator in favor of LTD's non-compliant, taxpayer-subsidized service.

II. PATTERN OF VIOLATIONS: THE 2024 TRIENNIAL REVIEW

LTD is currently under a **Corrective Action Plan** following the FTA's 2024 Triennial Review, which found LTD in violation of Charter Bus Service regulations. Specifically, the FTA flagged the **Butte-to-Butte shuttle** for:

- Providing exclusive service for a third-party event.
- Utilizing federally funded assets to compete with private operators.
- Operating under a "public service" label to bypass § 604 requirements.

LTD's current actions regarding the OCF shuttle are a direct continuation of these deficiencies. Despite being ordered to correct their policies, LTD is once again attempting to seize an event-specific shuttle market through exclusion and interference.

III. EVIDENCE OF SYSTEMIC NON-COMPLIANCE (RECIDIVISM)

Under 49 CFR § 604.27, an agency may be penalized for providing misleading information or acting in bad faith to discourage private participation. We submit the following:

- **Operational Interference:** LTD staff have actively "coached" OCF organizers regarding tree-trimming requirements along the shuttle route. This is a targeted effort to create an artificial barrier to entry for Pronto's motor coaches, pressuring the client to believe only LTD's smaller transit buses can navigate the route.
- **Admissions of Intent:** In a phone conversation, LTD's Bret Smith explicitly instructed Pronto to contact him "immediately" once a decision is made to withdraw, so that LTD can "step back in." This demonstrates that LTD's goal is not to facilitate a compliant solution, but to wait for a private operator's exit—which they are actively trying to manufacture.

IV. REFUSAL TO ENGAGE AND MISUSE OF ADVISORY PROCESS

Despite Pronto's diligent efforts to reach a collaborative resolution, LTD leadership has demonstrated a clear intent to prioritize agency-run service over regulatory compliance:

- **Rejection of § 604.8 Leasing:** On April 20, 2026, Pronto CEO Kumar Shah reached out to LTD President Jameson Auten to propose a compliant solution: leasing LTD equipment and operators to Pronto (pursuant to **49 CFR § 604.8**). This would have allowed the event to proceed seamlessly while respecting the Charter Rule. OCF / Kirsten Bolton had already expressed a desire for Pronto and LTD to work out the leasing arrangement to allow the OCF shuttle service to move forward. Instead of looking for a way to proceed with leasing of the equipment and drivers to Pronto - per 49 CFR 604.8 - LTD communicated to Ms. Bolton that LTD will not be leasing the equipment to Pronto. LTD declined Pronto's request for leasing without citing the reasons for the same. Instead, LTD chose to file an Advisory Opinion request to the FTA regarding leasing of equipment to Pronto.
- **Procedural Stalling:** Mr. Auten's response—stating that LTD is seeking "guidance" from the FTA rather than engaging in a lease—is a transparent stalling tactic. By refusing to lease to a willing and able private provider, LTD is creating a "service gap" that they intend to fill themselves.
- **The "Hostile Takeover" Strategy:** LTD's refusal to engage with Pronto, combined with their internal directives to OCF regarding tree-trimming and their explicit request to be notified of Pronto's withdrawal, reveals a coordinated strategy to manufacture a "failure" of the private sector to justify their own illegal entry into the market

V. Failure to Implement Mandatory Corrective Actions and Training

LTD's current conduct regarding the OCF shuttle represents a failure of the Corrective Action Plan (CAP) mandated by the FTA following the 2024 Triennial Review.

- **Ineffectiveness of Mandatory Training:** Although LTD compliance staff were required to attend specialized FTA Charter Bus Workshops, their current actions show a blatant disregard for the core principles taught in those sessions—specifically the prohibition of utilizing public assets to compete with private operators for third-party events.
- **Recidivism:** By repeating the exact patterns identified in the Butte-to-Butte violation (negotiated pricing for a third party and exclusion of private providers), LTD is demonstrating that its previous "commitment" to compliance was merely performative.
- **Willful Non-Compliance:** The fact that LTD is currently "seeking clarification" from the FTA on a matter they were just trained on suggests a bad-faith attempt to re-litigate settled rules rather than a genuine misunderstanding of the law.

VI. RELIEF REQUESTED

In light of the imminent nature of the event and the documented pattern of bad faith, Pronto respectfully requests that the FTA:

- 1. **Expedite the Response Deadline:** Order LTD to respond to this complaint within **10 business days**.
- 2. **Issue a Preliminary Notice of Investigation:** Formally advise LTD that providing OCF shuttle service while a qualified private provider is willing and able to lease equipment constitutes a willful violation of the Charter Rule.
- 3. **Regional Oversight:** Direct FTA Region 10 Counsel to oversee all OCF-related communications from LTD to ensure no further interference with private contracts occurs.

Best regards,
Kumar Shah
President & CEO
FTA Charter ID 6643



From: Kumar Shah
Sent: Monday, April 13, 2026 2:07 AM
To: Charterservice, Ombudsman (FTA) <ombudsman.charterservice@dot.gov>
Cc: ftaregion10@dot.gov <ftaregion10@dot.gov>; Bret Smith <bret.smith@ltd.org>; dave.roth@ltd.org <dave.roth@ltd.org>; Eric.Breitenstein@ltd.org <Eric.Breitenstein@ltd.org>; 'Heather Lindsay' <heather.lindsay@ltd.org>; kbolton@oregoncountryfair.org <kbolton@oregoncountryfair.org>; patrick.fiedler@ltd.org <patrick.fiedler@ltd.org>; jameson.auten@ltd.org <jameson.auten@ltd.org>
Subject: Response to Request for Advisory Opinion – Oregon Country Fair Shuttle Service (Pronto Journeys)

Dear Charter Ombudsman / Regional Administrator,

Please find attached Pronto Journeys’ formal response to the Request for Advisory Opinion submitted by Lane Transit District (LTD) on April 7, 2026, concerning the Oregon Country Fair (OCF) shuttle service.

We are also submitting herewith, in parallel, a formal complaint under 49 C.F.R. Part 604 addressing LTD’s denial of leasing under §604.8, its stated intent to provide the service under §604.9, and related actions that have materially affected the Charter Service process.

As detailed in the attached submission, this matter arises from a specific and time-sensitive set of facts involving:

- A registered charter provider that responded affirmatively and remains ready, willing, and able to perform the service;

- A recipient's denial of access to federally funded equipment under §604.8 without identifying any unmet regulatory condition; and
- The recipient's subsequent position that it may provide the same service directly.

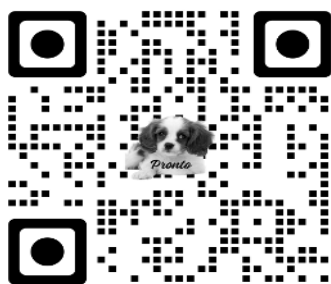
We respectfully submit that this presents a concrete and non-hypothetical application of the Charter Service Rule, with immediate implications for the availability of shuttle service for the Oregon Country Fair.

Given the proximity of the event and the need for operational certainty, we respectfully request expedited consideration of both the advisory response and the accompanying complaint.

We would welcome the opportunity to provide any additional information or supporting materials that may assist in your review.

Thank you for your attention to this matter.

Respectfully,
Kumar Shah
President
Pronto Corporation
FTA Charter Registration ID: 6643



Scan me to watch me in action



Pronto Journeys

Safe. Dependable. Comfortable.



Group Transportation since 2005
60K+ Trips. 2.4M+ Passengers.
100% Injury-free

RATING: 4.93 / 5.0

★★★★★

Kumar Shah, President

+1-650-249-7418
Kumar@ProntoJourneys.com
84 W Santa Clara St, Ste 700
San Jose, CA 95113



From: no-reply@regulations.gov <no-reply@regulations.gov>
Sent: Wednesday, April 8, 2026 5:00 PM
To: regulationshelpdesk@gsa.gov
Subject: Regulations.gov - Scheduled Notification for FTA-2007-0023

The following information describes the docket you have subscribed to, and what updates have occurred for the docket. If you want to view the docket, click the Docket ID link.

Docket Information

Subscribed Docket: [FTA-2007-0023](#)

Notification Frequency: Daily

Number of Documents: 2

Document Information

The documents listed below are the documents within the subscribed docket that have been added, modified, or withdrawn. Please click on the associated Document ID link if you wish to view a specific document within Regulations.gov.

Document ID: [FTA-2007-0023-0089](#)

Document Title: Request for Advisory Opinion and Cease and Desist Order 2/11/2009

Document Type: Other

Date Posted: 2009-03-10T04:00:00Z

Document ID: [FTA-2007-0023-0195](#)

Document Title: Advisory Opinion- Lane Transit District

Document Type: Other

Date Posted: 2026-04-08T04:00:00Z

To unsubscribe from future Docket Notification emails for FTA-2007-0023, please refer to the original Regulations.gov Subscription Confirmation Request email. A link is provided to unsubscribe from the docket.

Please do not reply to this message as this report has been sent from an unmonitored mailbox.

If you did not authorize the subscription of email alerts from Regulations.gov or for any other questions regarding this docket subscription, please contact the Regulations.gov Help Desk at 1-866-498-2945 between 9AM-5PM EST Monday-Friday.

Pursuant to **49 CFR Part 604, Subpart F, § 604.27**, Pronto Corporation formally files this **Notice of Charter Service Complaint** against Lane Transit District (LTD).

I affirm that the undersigned swears, to the best of his knowledge and belief, this complaint includes all data, information, and views relevant to this matter, whether favorable or unfavorable to the position of the undersigned, which is the subject of this complaint.

I hereby certify that I have on this day served the foregoing **Notice of Charter Service Complaint** on the following persons by:

US Mail:

Lane Transit District (LTD)
Jameson Auten, Chief Executive Officer
3500 E 17th Avenue, Eugene, OR 97403

The Oregon Country Fair
Attn: Kristen Bolton
442 Lawrence St
Eugene, OR 97401

Email:

Jameson.Auten@ltd.org
Kbolton@oregoncountryfair.org
Ombudsman.charter@dot.gov
matthew.cahill@dot.gov

FTA Electronic Filing: Docket FTA-2007-0023 at <http://www.Regulations.gov>

Dated 29th day of June 2026
Pronto Corporation



Kumar Shah
President, CEO and Chairman
84 W Santa Clara St, Suite 700, San Jose, CA 95113

**BEFORE THE FEDERAL TRANSIT ADMINISTRATION
OFFICE OF THE CHIEF COUNSEL
PRONTO CORPORATION
(Accelar, Inc., FTA Charter Registration ID: 6643)
Complainant,
v.
LANE TRANSIT DISTRICT (LTD)
Respondent.**

DATE: June 29, 2026

Dear Chief Counsel and Charter Service Ombudsman,

Re: Notice of Charter Service Complaint against Lane Transit District (LTD)

Pursuant to **49 CFR Part 604, Subpart F, § 604.27**, Pronto Corporation formally files this **Notice of Complaint** against Lane Transit District (LTD).

Pronto Corporation ("Pronto") hereby formally submits this preamble to clarify the procedural posture of our filings and to establish a clean, indisputable regulatory track under **49 CFR Part 604, Subpart F**.

Pronto acknowledges that our initial market interference complaint, dated April 12, 2026, was appended as evidentiary exhibits to our response to Lane Transit District's (LTD) Request for an Advisory Opinion. Our subsequent filings and subsequent emergency supplements, dated April 26, 2026 (**Exhibit A.1**), and June 1, 2026 (**Exhibit A.6**) were also submitted via e-mail but did not follow the proper filing requirements specified in 604.27.

Because those submissions were procedurally swept into the informal, non-binding review track of **Subpart E**, the FTA subsequently issued an ad-hoc administrative determination on April 28, 2026 (**Exhibit A.4**), followed by a closure notification on June 9, 2026 (**Exhibit A.7**), without opening a tracked investigation. The Ombudsman asserted that because the advisory track was addressed, the substantive complaint required "no further action".

Because of this filing discrepancy of our complaint, the central allegations of predatory bad faith and carrier exclusion have never been formally investigated, docketed, or adjudicated by the Office of Chief Counsel.

To cure any past procedural deficiencies, **Pronto is now officially filing this Formal Complaint in accordance with 49 CFR § 604.27.**

Per **49 CFR § 604.29**, we request you to docket this Complaint packet, assign a new sub-number within the master **Docket ID: FTA-2007-0023**, and require LTD to file a formal legal answer urgently since the start date for the OCF is July 10, 2026.

Pronto has fully met every filing requirement, including the simultaneous service mandate to the Respondent under **§ 604.31**.

We request that the FTA process this filing immediately, recognize that the OCF matter is not closed until this cured complaint is adjudicated on its merits.

Because the OCF Shuttle Service is scheduled to commence on **July 10, 2026**, Pronto requests an **Expedited Investigation** to avoid disruption of the shuttle service and to the faregoers.

Concurrent with this filing, a true copy of this packet is being served directly upon the Respondent's Chief Executive Officer (CEO) via electronic mail, satisfying **49 CFR § 604.31**.

We await your formal Docket ID notification and the immediate issuance of a response.

Prior Notice to Lane Transit District

Although Pronto recognizes that its April 12, 2026, complaint submission did not follow the process outlined in 602.27, LTD nevertheless received that submission contemporaneously.

Accordingly, beginning on April 12, 2026, LTD had actual notice that:

- Pronto disputed LTD's interpretation and application of 49 CFR Part 604;
- Pronto asserted that it remained ready, willing, and able to provide the Oregon Country Fair service;
- Pronto objected to LTD's efforts to reclaim the service; and
- Pronto alleged that LTD's conduct was inconsistent with the Charter Rule.

LTD therefore cannot reasonably contend that it lacked notice of either the factual allegations or the legal issues raised by Pronto. Despite receiving that notice nearly three months before the scheduled event, LTD continued preparations to operate the service without taking corrective action or attempting to resolve the issues raised.

This Complaint is filed to invoke the formal procedures of Subpart F and obtain an adjudication of those issues on their merits.

This Complaint concerns the conduct of Lane Transit District as a recipient of Federal transit assistance and requests a determination under 49 CFR Part 604 regarding LTD's compliance with the Charter Service Rule. This Complaint does not seek review of FTA's April 28, 2026, advisory determination, which Pronto intends to address separately through a petition for administrative reconsideration.

This Complaint is directed solely to LTD's conduct as a recipient of Federal transit assistance. Pronto reserves all rights with respect to FTA's April 28, 2026, determination, which will be addressed in a separate administrative filing.

While a properly filed complaint remains pending, LTD should not continue to rely upon the April 28 determination as conclusive authority to operate the service because that determination itself is the subject of a pending request for reconsideration.

Respectfully submitted,



Kumar Shah
President, CEO, & Chairman
Pronto Corporation / Accelar, Inc.

CC Via Electronic Mail:

Jameson Auten, Chief Executive Officer, Lane Transit District (LTD)

NOTICE OF FTA CHARTER SERVICE COMPLAINT PURSUANT TO 49 CFR § 604.27

Description of the Complaint

This formal complaint arises under the Federal Transit Administration (FTA) Charter Service Regulations (**49 CFR Part 604**) and **49 U.S.C. § 5323(d)** in connection with the 2026 Oregon Country Fair (OCF) shuttle service.

Accelar, Inc. dba Pronto Corporation ("Pronto"), a registered private charter provider in good standing, responded affirmatively to LTD's public Charter Notice and engaged in continuous good faith to deploy a compliant, demand-responsive transit plan. Despite Pronto satisfying all the conditions set forth in **49 CFR § 604.8(a)**, LTD has committed severe, actionable regulatory violations by:

1. Engaging in bad-faith commercial and administrative interference to systematically force Pronto's withdrawal.
2. Illegally planning to operate the charter corridor directly under **§ 604.9**, despite the presence of an active, responsive, and willing private operator.
3. Arbitrarily denying Pronto's vehicle and driver lease request under **§ 604.8** without identifying any unmet regulatory conditions.
4. Refusing to provide factual support or operational explanations in response to multiple requests for clarification.

These actions violate **49 U.S.C. § 5323(d)**, the open-competition rules of **2 CFR § 200.319**, and the discriminatory procurement prohibitions of **49 U.S.C. § 5323(h)(3)**.

4. Factual Basis

A. Charter Notice and Response

LTD issued a public Charter Notice for the July 10–12, 2026 OCF shuttle service under Part 604. Pronto submitted a timely, affirmative response on January 5, 2026. Pronto's affirmative response remains open, active, and has never been withdrawn.

B. Continuous Engagement and Operational Planning

Pronto and its affiliate, MTR Western, engaged in extensive operational planning with OCF organizers from December 2025 through March 2026 (Exhibits B.1, B.2, B.3, B.4, B.5, B.6, B.7, B.8, B.9, B.10, B.11, B.12). Pronto developed an optimized, demand-responsive configuration built on three years of historical ridership records, cutting OCF's historical transit costs by more than 10%.

Throughout the process, we reaffirmed that we remain ready, willing, and able to perform the service. This was communicated in the email messages to OCF, LTD and FTA on Jan 5, Jan 22, Feb 18, and all other correspondence in March, April, May and June.

C. Proper Invocation of § 604.8 Leasing

When OCF organizers declined to trim low-hanging branches required to clear standard motorcoaches, Pronto presented to OCF organizers the option to use transit buses leased under the regulatory remedy of **49 CFR § 604.8**, requesting to lease LTD's own low-profile transit buses at a published, fully allocated cost. Pronto factually satisfied every required benchmark under § 604.8(a), a status explicitly verified by LTD's own public filings.

D. Discriminatory Denial and Bad-Faith Non-Engagement

On March 3, 2026, LTD Director Dave Roth denied Pronto's leasing request without identifying a single unmet regulatory condition (p. 2). LTD subsequently refused to respond to any operational inquiries. The intent behind this refusal was confirmed on April 20, 2026, when LTD CEO Jameson Auten explicitly wrote: *"LTD's understanding is that we are not required to lease vehicles or people."* LTD willfully weaponized its leasing discretion to manufacture an artificial private sector asset shortage.

E. Documented Record of Tortious Market Interference

Public records requests uncovered an explicit paper trail of collusion designed to freeze Pronto out of the market. On December 24, 2025, LTD Senior Service Planner Bret Smith actively coached OCF Executive Director Kirsten Bolton to maintain the route clearance barriers to force a private failure, writing: *"I suspect when they realize you will not be trimming trees... I am guessing they will pull out... we will need an email of retraction from them in order for LTD to provide the service."*

Additionally, OCF coordinators directly called MTR Western to discourage and dissuade them from participating in the service, directly interfering with private commercial relations.

F. LTD's Reliance on § 604.9

LTD has asserted that it may run the shuttle directly under **49 CFR § 604.9**. However, § 604.9 and its accompanying Appendix C guidance apply *only* if a private operator is non-responsive or withdraws interest. Pronto has repeatedly notified the customer, LTD, and the FTA that it remains ready, willing, and able to operate the OCF Shuttle Services.

5. Violations of 49 CFR Part 604 & Federal Transit Law

A. Improper Denial of § 604.8 Leasing

LTD denied fleet access without identifying any unmet condition under § 604.8(a), blocking a qualified provider from performing the service (p. 2).

B. Procurement Discrimination under 49 U.S.C. § 5323(h)(3)

By offering specialized equipment and labor terms to a third-party non-transit entity (OCF) while blocking a registered private carrier from leasing those identical assets, LTD has engaged in procurement discrimination.

C. Documented Administrative Recidivism

LTD is currently operating under a formal Corrective Action Plan (CAP) issued during the FTA's August 2024 Triennial Review for direct Charter Bus Service violations. The FTA previously caught LTD utilizing public assets under a false "public service" label to run the Butte-to-Butte race shuttle. LTD's current actions are a repeat of the exact deficiencies required by FTA for LTD to correct under their active CAP.

6. Harm and Competitive Injury

LTD's actions have resulted in:

- Direct commercial obstruction of a certified, qualified charter provider.
- Severe reputational harm to Pronto through false claims of market "incapacity".
- A manufactured transit crisis endangering the mobility of OCF fairgoers.
- A dangerous national precedent allowing public entities to ignore active Charter Notice responses.

7. Relief Requested

Pronto Corporation respectfully requests that the FTA Office of Chief Counsel:

1. Determine that LTD has violated **49 CFR Part 604** and **49 U.S.C. § 5323(d)**.
2. Determine whether LTD properly relied upon §604.9 under the facts presented.
3. Determine that LTD's denial of leasing under **§ 604.8** was unsupported and discriminatory and in violation of Equal Access and fairness doctrines.
4. Determine whether LTD violated Part 604.
5. Determine whether LTD properly invoked §604.9.
6. Determine whether LTD properly denied leasing under §604.8.
7. Determine whether LTD's conduct complied with the Charter Notice procedures.
8. Determine whether Pronto's affirmative response remained valid.
9. Order whatever corrective action Part 604 authorizes.

9. Certification

I declare under penalty of perjury that the foregoing information provided in this complaint is true and correct to the best of my knowledge, information, and belief.

Signed:



Kumar Shah
President, CEO, & Chairman
Pronto Corporation / Accelar, Inc.
Dated: June 29, 2026

APPENDIX A: CHRONOLOGICAL DISCOVERY & FILING INDEX

- **Exhibit A.1:** Complainant's Emergency Supplement and Request for Expedited Review filed with the FTA Office of Chief Counsel (Dated April 26, 2026) — *Unadjudicated/Unreviewed by FTA.*
- **Exhibit A.2:** Formal Part 604 Complaint and Interference Memorandum against Lane Transit District filed with the FTA Charter Ombudsman (Dated April 13, 2026) — *Unadjudicated/Unreviewed by FTA.*
- **Exhibit A.3:** Administrative Docket Notification from Regulations.gov verifying receipt and opening of Docket ID: FTA-2007-0023-0195 regarding Lane Transit District (Dated April 8, 2026).
- **Exhibit A.4:** Administrative Determination and Advisory Opinion Email issued by FTA Charter Ombudsman Kathy Breeden (Dated April 28, 2026).
- **Exhibit A.5:** LTD Triennial Review, Butte-to-Butte Charter Services Violations Email from Kumar Shah to Jameson Auten, CEO of LTD (Dated April 26, 2026).
- **Exhibit A.6:** Request for Immediate Chief Counsel Review, Procedural Intervention, and Clarification (Dated June 1, 2026)
- **Exhibit A.7:** Pronto – Ombudsman E-mail (Dated June 9, 2026)

APPENDIX B: CUMULATIVE CUSTOMER TRAIL & CONTRACTUAL HISTORY

- **Exhibit B.1 (March 4, 2026):** Written correspondence from Kirsten Bolton (Executive Director, OCF) to Kumar Shah confirming local route congestion geometry down Clear Lake and Bus Road.
- **Exhibit B.2 (March 4, 2026):** Strategic request from Kumar Shah to OCF proposing an alternative Southern OR-126 access feasibility route to bypass low clearance zones and enable Option 2 (LTD Asset Leasing).
- **Exhibit B.3 (March 3, 2026):** Formal 2026 OCF Shuttle Certainty Notice outlining Option 1 (Pronto absorbing the \$8,000 tree clearance quote) and Option 2 (The \$110,000 fixed-price LTD asset lease).
- **Exhibit B.4 (February 23, 2026):** Formal 2026 OCF Shuttle Proposal Executive Summary, providing detailed peak capacity modeling of 13,860 seats based on a 3-year ridership baseline.
- **Exhibit B.5 (February 22, 2026):** Route Planning Update and dry-run video field logs targeting staging points along Nansleeze Road and Aero Road.
- **Exhibit B.6 (February 18, 2026):** Operational framework overview outlining demand-responsive scaling, vehicle selection parameters, and baseline modeling inputs sent to OCF.
- **Exhibit B.7 (February 16, 2026):** Detailed update letter analyzing historical passenger statistics (\$123,301 spent in 2025) and introducing Pronto's nationwide network of operators.
- **Exhibit B.8 (January 22, 2026):** Due diligence follow-up confirming Pronto's commitment to strict vendor compliance, cost sensitivities, and reliability metrics.
- **Exhibit B.9 (January 21, 2026):** Progress response to OCF reviewing the first financial production of historical transit records from the LTD Finance and Operations teams.
- **Exhibit B.10 (January 9, 2026):** Written confirmation from Kirsten Bolton acknowledging scheduling of regional discovery tracks.
- **Exhibit B.11 (January 5, 2026):** Transmittal of the formal email confirmation indicating Pronto's affirmative response to the LTD Charter Notice under 49 CFR § 604.14.
- **Exhibit B.12 (December 30, 2025):** Initial intake notification from Kirsten Bolton welcoming direct coordination to evaluate private sector capabilities.

Exhibit A.1

Emergency Request for Expedited Review and Preliminary Findings

From Kumar Shah <kumar@prontojourneys.com>

Date Sun 2026-04-26 17:19

To Charterservice, Ombudsman (FTA) <ombudsman.charterservice@dot.gov>

Cc Eric.Breitenstein@ltd.org <Eric.Breitenstein@ltd.org>; ftaregion10@dot.gov <ftaregion10@dot.gov>; Bret Smith <bret.smith@ltd.org>; dave.roth@ltd.org <dave.roth@ltd.org>; 'Heather Lindsay' <heather.lindsay@ltd.org>; kbolton@oregoncountryfair.org <kbolton@oregoncountryfair.org>; patrick.fiedler@ltd.org <patrick.fiedler@ltd.org>; jameson.auten@ltd.org <jameson.auten@ltd.org>

To: Federal Transit Administration, Office of the Chief Counsel

In Re: Complaint against Lane Transit District (LTD) regarding Oregon Country Fair (OCF) Shuttle

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- Providing exclusive service for a third-party event.
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- Operating under a "public service" label to bypass § 604 requirements.

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- **Operational Interference:** LTD staff have actively "coached" OCF organizers regarding tree-trimming requirements along the shuttle route. This is a targeted effort to create an artificial barrier to entry for Pronto's motor coaches, pressuring the client to believe only LTD's smaller transit buses can navigate the route.
-
- **Admissions of Intent:** In a phone conversation, LTD's Bret Smith explicitly instructed Pronto to contact him "immediately" once a decision is made to withdraw, so that LTD can "step back in." This demonstrates that LTD's goal is not to facilitate a compliant solution, but to wait for a private operator's exit—which they are actively trying to manufacture.

IV. REFUSAL TO ENGAGE AND MISUSE OF ADVISORY PROCESS

Despite Pronto's diligent efforts to reach a collaborative resolution, LTD leadership has demonstrated a clear intent to prioritize agency-run service over regulatory compliance:

- **Rejection of § 604.8 Leasing:** On April 20, 2026, Pronto CEO Kumar Shah reached out to LTD President Jameson Auten to propose a compliant solution: leasing LTD equipment and operators to Pronto (pursuant to **49 CFR § 604.8**). This would have allowed the event to proceed seamlessly while respecting the Charter Rule. OCF / Kirsten Bolton had already expressed a desire for Pronto and LTD to work out the leasing arrangement to allow the OCF shuttle service to move forward. Instead of looking for a way to proceed with leasing of the equipment and drivers to Pronto - per 49 CFR 604.8 - LTD communicated to Ms. Bolton that LTD will not be leasing the equipment to Pronto. LTD declined Pronto's request for leasing without citing the reasons for the same. Instead, LTD chose to file an Advisory Opinion request to the FTA regarding leasing of equipment to Pronto.
- **Procedural Stalling:** Mr. Auten's response—stating that LTD is seeking "guidance" from the FTA rather than engaging in a lease—is a transparent stalling tactic. By refusing to lease to a willing and able private provider, LTD is creating a "service gap" that they intend to fill themselves.
- **The "Hostile Takeover" Strategy:** LTD's refusal to engage with Pronto, combined with their internal directives to OCF regarding tree-trimming and their explicit request to be notified of Pronto's withdrawal, reveals a coordinated strategy to manufacture a "failure" of the private sector to justify their own illegal entry into the market

V. Failure to Implement Mandatory Corrective Actions and Training

LTD's current conduct regarding the OCF shuttle represents a failure of the Corrective Action Plan (CAP) mandated by the FTA following the 2024 Triennial Review.

- **Ineffectiveness of Mandatory Training:** Although LTD compliance staff were required to attend specialized FTA Charter Bus Workshops, their current actions show a blatant disregard for the core principles taught in those sessions—specifically the prohibition of utilizing public assets to compete with private operators for third-party events.
- **Recidivism:** By repeating the exact patterns identified in the Butte-to-Butte violation (negotiated pricing for a third party and exclusion of private providers), LTD is demonstrating that its previous "commitment" to compliance was merely performative.
- **Willful Non-Compliance:** The fact that LTD is currently "seeking clarification" from the FTA on a matter they were just trained on suggests a bad-faith attempt to re-litigate settled rules rather than a genuine misunderstanding of the law.

VI. RELIEF REQUESTED

In light of the imminent nature of the event and the documented pattern of bad faith, Pronto respectfully requests that the FTA:

1. **Expedite the Response Deadline:** Order LTD to respond to this complaint within **10 business days**.
2. **Issue a Preliminary Notice of Investigation:** Formally advise LTD that providing OCF shuttle service while a qualified private provider is willing and able to lease equipment constitutes a willful violation of the Charter Rule.
3. **Regional Oversight:** Direct FTA Region 10 Counsel to oversee all OCF-related communications from LTD to ensure no further interference with private contracts occurs.

Best regards,
Kumar Shah
President & CEO
FTA Charter ID 6643



From: Kumar Shah
Sent: Monday, April 13, 2026 2:07 AM
To: Charterservice, Ombudsman (FTA) <ombudsman.charterservice@dot.gov>
Cc: ftaregion10@dot.gov <ftaregion10@dot.gov>; Bret Smith <bret.smith@ltd.org>; dave.roth@ltd.org <dave.roth@ltd.org>; Eric.Breitenstein@ltd.org <Eric.Breitenstein@ltd.org>; 'Heather Lindsay' <heather.lindsay@ltd.org>; kbolton@oregoncountryfair.org <kbolton@oregoncountryfair.org>; patrick.fiedler@ltd.org <patrick.fiedler@ltd.org>; jameson.auten@ltd.org <jameson.auten@ltd.org>
Subject: Response to Request for Advisory Opinion – Oregon Country Fair Shuttle Service (Pronto Journeys)

Dear Charter Ombudsman / Regional Administrator,

Please find attached Pronto Journeys' formal response to the Request for Advisory Opinion submitted by Lane Transit District (LTD) on April 7, 2026, concerning the Oregon Country Fair (OCF) shuttle service.

We are also submitting herewith, in parallel, a formal complaint under 49 C.F.R. Part 604 addressing LTD's denial of leasing under §604.8, its stated intent to provide the service under §604.9, and related actions that have materially affected the Charter Service process.

As detailed in the attached submission, this matter arises from a specific and time-sensitive set of facts involving:

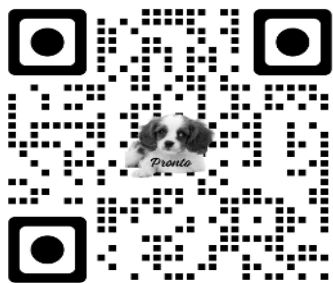
- A registered charter provider that responded affirmatively and remains ready, willing, and able to perform the service;
- A recipient's denial of access to federally funded equipment under §604.8 without identifying any unmet regulatory condition; and
- The recipient's subsequent position that it may provide the same service directly.

We respectfully submit that this presents a concrete and non-hypothetical application of the Charter Service Rule, with immediate implications for the availability of shuttle service for the Oregon Country Fair.

Given the proximity of the event and the need for operational certainty, we respectfully request expedited consideration of both the advisory response and the accompanying complaint.

We would welcome the opportunity to provide any additional information or supporting materials that may assist in your review.

Thank you for your attention to this matter.
Respectfully,
Kumar Shah
President
Pronto Corporation
FTA Charter Registration ID: 6643



Scan me to watch me in action



Pronto Journeys
Safe. Dependable. Comfortable.



Group Transportation since 2005
60K+ Trips. 2.4M+ Passengers.
100% Injury-free

RATING: 4.93 / 5.0



Kumar Shah, President

+1-650-249-7418

Kumar@ProntoJourneys.com

84 W Santa Clara St, Ste 700
San Jose, CA 95113



From: no-reply@regulations.gov <no-reply@regulations.gov>
Sent: Wednesday, April 8, 2026 5:00 PM
To: regulationshelpdesk@gsa.gov
Subject: Regulations.gov - Scheduled Notification for FTA-2007-0023



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Document ID: [FTA-2007-0023-0089](#)

Document Title: Request for Advisory Opinion and Cease and Desist Order 2/11/2009

Document Type: Other

Date Posted: 2009-03-10T04:00:00Z

Document ID: [FTA-2007-0023-0195](#)

Document Title: Advisory Opinion- Lane Transit District

Document Type: Other

Date Posted: 2026-04-08T04:00:00Z

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Exhibit A.2



NOTICE OF FTA CHARTER SERVICE COMPLAINT

April 13, 2026

1. Complainant Information

Name: Kumar Shah

Title: President

Company: Pronto Journeys

FTA Charter Registration ID: 6643

Address: 84 W Santa Clara St, Suite 700, San Jose, CA 95113

Email: kumar@ProntoJourneys.com

Phone: 650.249.7418 (w) 408.472.5662 (Mobile)

2. Respondent Information

Agency: Lane Transit District (LTD)

Address: 3500 E 17th Avenue, Eugene, OR 97403

Primary Contact: Jameson Auten, CEO

Dave Roth, Director of Mobility Planning and Policy

Bret Smith, Senior Service Planner

Heather Lindsay

Eric Breitenstein

3. Description of the Complaint

This complaint arises under the Federal Transit Administration (FTA) Charter Service Rule (49 C.F.R. Part 604) in connection with the Oregon Country Fair (OCF) 2026 shuttle service.

Accelar, Inc. dba Pronto Journeys ("Pronto"), a registered charter provider, responded affirmatively to LTD's charter notice and engaged in good faith to develop and deliver a compliant and efficient shuttle service plan.

Despite Pronto meeting all requirements under 49 C.F.R. §604.8(a), LTD:

1. **Denied Pronto's request to lease vehicles and operators** under §604.8 without identifying any unmet regulatory condition;
2. **Failed to provide any substantive explanation** in response to follow-up requests for clarification;
3. **Engaged in conduct that interfered with the Charter Service process**, including influencing the client and positioning for Pronto's withdrawal; and
4. **Sought to provide the service directly under §604.9**, despite the presence of a qualified, willing, and able registered charter provider.

These actions collectively constitute violations of the Charter Service Rule and its underlying statutory framework.

4. Factual Basis

A. Charter Notice and Response

LTD issued a charter notice for the OCF shuttle service.

Pronto, a registered charter provider (ID 6643), responded affirmatively and in a timely manner.

B. Engagement and Operational Planning

Pronto:

- Engaged directly with OCF
- Developed multiple service models
- Explored private operator capacity (motorcoach, school bus, hybrid solutions)

Pronto Corporation

Pronto Group Transportation Network (GTN) - The Network Model for Group Transportation

84 W Santa Clara St, Suite 700, San Jose, CA

650.249.7400 | www.ProntoJourneys.com | www.ProntoExperiences.com

- Addressed all operational constraints communicated by OCF
-

C. Invocation of §604.8 Leasing

After exhausting private operator options under the constraints imposed by OCF, Pronto formally requested leasing of LTD vehicles and operators pursuant to §604.8.

Pronto satisfied all required conditions:

- Registered charter provider
 - Operates charter service
 - Received request exceeding capacity under constraints
 - Exhausted available private operators
-

D. LTD Denial Without Basis

On March 3, 2026, LTD denied Pronto's leasing request, stating only that it did not meet §604.8 requirements. LTD did not:

- Identify any specific condition not satisfied;
 - Provide factual support; or
 - Respond to subsequent requests for clarification.
-

E. Interference with Charter Process

LTD engaged in conduct that interfered with the Charter Service process, including:

- Advising the client that Pronto would likely withdraw under certain conditions;
 - Indicating to Pronto that it should notify LTD when it "decides to back down";
 - Communicating to the client that leasing would not be made available to Pronto.
-

F. Attempt to Invoke §604.9

LTD has asserted that it may provide the service directly.

However:

- Pronto responded to the charter notice
- Pronto engaged and developed plans
- Pronto remains ready, willing, and able

Accordingly, §604.9 is not applicable.

5. Violations of 49 C.F.R. Part 604

A. Improper Denial of §604.8 Leasing

LTD denied leasing without identifying any unmet condition under §604.8(a), effectively preventing a qualified provider from performing service.

B. Interference with Charter Service Process

LTD's conduct influenced the client and undermined the neutral administration of the charter process.

C. Improper Attempt to Provide Service Under §604.9

LTD seeks to provide charter service despite the presence of a qualified and responsive charter provider.

D. Inconsistent Application of Charter Rule

LTD's actions create a framework whereby a recipient may:

- Deny leasing;
-

- Declare a provider incapable; and
- Provide the service directly

This is inconsistent with the Charter Service Rule and 49 U.S.C. §5323(d).

6. Harm

LTD's actions have resulted in:

- Obstruction of a qualified charter provider;
 - Risk of unavailability of shuttle service for OCF attendees;
 - Distortion of the competitive process; and
 - Undermining of the Charter Service Rule.
-

7. Relief Requested

Pronto respectfully requests that FTA:

1. **Determine that LTD violated 49 C.F.R. Part 604**
 2. **Find that §604.9 is not applicable in this case**
 3. **Determine that LTD's denial of leasing under §604.8 was unsupported**
 4. **Direct LTD to comply with the Charter Service Rule in its handling of this matter**
 5. **Prohibit LTD from providing charter service for the OCF under §604.9**
 6. Grant such other relief as FTA deems appropriate
-

8. Supporting Documentation

Supporting documents are attached and include:

- Charter notice and response
 - Leasing request and LTD denial
 - Follow-up correspondence
 - Communications with OCF
 - Communications with private operators
 - Operational analysis
 - LTD advisory opinion submission
-

9. Certification

I certify that the information provided in this complaint is true and correct to the best of my knowledge.

Signed:



Kumar Shah
President, Pronto Journeys

**BEFORE THE FEDERAL TRANSIT ADMINISTRATION
OFFICE OF CHIEF COUNSEL
OMBUDSMAN for CHARTER SERVICES**

**RESPONSE OF PRONTO CORPORATION
TO REQUEST FOR ADVISORY OPINION SUBMITTED BY LANE TRANSIT DISTRICT
REGARDING APPLICATION OF 49 C.F.R. PART 604
(OREGON COUNTRY FAIR SHUTTLE SERVICE)**

Submitted by:
Pronto Journeys
FTA Charter Registration ID: 6643
April 12, 2026

I. INTRODUCTION

Accelar, Inc. dba Pronto Corporation and Pronto Journeys (www.ProntoJourneys.com) (“Pronto”), a registered charter provider under the Federal Transit Administration (“FTA”) Charter Service Rule, submits this response to the Request for Advisory Opinion (“RFAO”) filed by Lane Transit District (“LTD”) on April 7, 2026.

LTD’s submission presents a materially incomplete, and in several respects incorrect, characterization of both the factual record and the governing regulatory framework. Specifically, LTD has:

1. Represented Pronto as lacking capacity to perform the requested charter service;
2. Asserted an overly broad interpretation of discretionary authority under 49 C.F.R. §604.8; and
3. Positioned itself to provide the very charter service at issue under 49 C.F.R. §604.9, while interfering with Pronto’s ability to operate the service.

This response provides a complete factual chronology, supported by documentary evidence, and demonstrates that LTD’s position is inconsistent with both the letter and intent of 49 C.F.R. Part 604 and its statutory foundation in 49 U.S.C. §5323(d).

II. STATEMENT OF FACTS

A. Issuance of Charter Notice and Pronto’s Response

LTD issued a charter notice for the Oregon Country Fair (“OCF”) 2026 shuttle service. (**EXHIBIT A.1 – Charter Notice**). We, a duly registered charter provider, responded affirmatively and in a timely manner,

thereby establishing our status as a responding provider under the Charter Service Rule.
(EXHIBIT A.2, A.3, A.4).

B. Engagement with OCF

Following our response to LDT, we engaged directly with OCF's Executive Director Kirsten Bolton via email (Exhibit B.1) and communicated to her Pronto's acceptance of the Charter Notice. We then scheduled a call with her on 01-08-2026 to gather additional details of OCF's requirements. The call was attended by Kirsten Bolton ("KB") from OCF and Pronto personnel – Kumar Shah, and Pronto Operations Team.

During the call, KB shared with us the following:

- a) LDT had been operating the shuttle services for OCF for 20+ years and she was uncomfortable switching to a different / private operator;
- b) Using private buses and motor coaches for the OCF shuttle service would cost a lot more and that OCF could not afford to pay even a dollar more for the shuttle service and if Pronto's proposed rate came in even a dollar more than LDT's rate she would reject it;
- c) The low-hanging branches of the trees lining the access road on the OCF property would cause damage to buses and motorcoaches since they have a higher profile than transit buses;
- d) Several other operators had indicated they would be ready, willing, and able to provide the shuttle services for OCF in prior years, but they backed down because of some of these challenges.

Pronto indicated during the call that at this time we were doing our due diligence to figure out what it would take for us to operate the service and that the next step was for us to gather data from LTD for the shuttle services they operated in the prior three years.

After the call, we emailed her a summary of our plan to meet OCF's shuttle service requirements [Exhibit B.3]. Kirsten Bolton (KB) responded on 01-09-2026 *"Thank you, Kumar. I look forward to hearing from you in the next few weeks."* (Exhibit B.4).

C. Due Diligence, Analysis & Proposed Options

We then proceeded with our plan:

- a) Review and analysis of historical data of the shuttle services for the prior 3 years

We sent requests to LDT – under the Public Records Act (Sunshine Law in Oregon) – for all the records related to their operation of the Shuttle Services for 2023, 2024 and 2025. LDT

responded to the requests immediately and provided all the data and documents responsive to our requests.

Upon receipt of the information and the data, we built an extensive demand model for the shuttle services based on boardings per hour throughout the day for all three (3) days of the event for the years 2023, 2024, and 2025. Based on KB's guidance, we built the demand model for 2026 based on the data for 2025.

Our analysis revealed that the demand varied significantly from day to day – with Day 2 showing the highest number of boardings – and from hour to hour throughout the day.

LTD operated the shuttle service with 20 buses in 2025 on all three (3) days. Even on Day 2, which had the highest number of boardings, the buses completed an average of more than 2 and less than 3 loops for the entire day.

b) Equipment availability from private charter operators in / around Veneta / Eugene, Oregon

As we have done for large scale events for the past 15+ years - San Francisco 49ers home games, Paul McCartney concert, JayZ and Justin Timberlake concert, University of California Berkeley football games - our operations team reached out to our affiliates in / around Veneta and Eugene, Oregon. We identified two affiliates who had more than 30 motor coaches available for the OCF shuttle services.

c) Site Visit and Dry Run of the Route

Four representatives of Our Eugene, Oregon based affiliate, MTR Western, visited the OCF site and did a dry run. Video recording of the route was shared with us by the affiliate.

After reviewing the video recording and based on a detailed report of the site visit by our affiliate, we identified the low hanging branches of the trees needing trimming and clearance of the brush lining the access roads. We then shared the recording with a local company – Purple Heart Tree Service – to get an estimate for the requisite tree trimming and other pruning / clearance to make the access roads accessible for motorcoaches.

d) Demand model for 2026 OCF

Based on this review of historical data and based on our detailed hourly demand model for each of the three days of the event, we came up with our projections of buses required:

- Friday (July 10, 2026) – 6 articulated buses
- Saturday (July 11, 2026) – 7 articulated buses
- Sunday (July 12, 2026) – 6 articulated buses

e) Shuttle service options / proposal for OCF

Once we received the estimate we factored into our plan and on 03-03-2026, we presented a proposal to KB / OCF with two options:

Option 1 – Dedicated Motorcoach Shuttle Program

- Dedicated fleet sized to meet peak 2025 hourly demand
- Comfortable seated capacity for all riders
- Fixed Contract Price: **\$110,000**
- In exchange for a three-year agreement, Pronto would absorb the one-time \$8,000 clearance cost
- 3% annual adjustment

This structure provides a fully dedicated fleet and operational certainty over a multi-year horizon.

Option 2 – LTD Vehicles & Operators (Leasing Structure)

As a registered charter provider, Pronto is responsible for ensuring any solution aligns with the FTA Charter Rule framework. We are engaged in discussions with Lane Transit District regarding a compliant vehicle and operator leasing structure.

Under this model:

- LTD vehicles and operators would be utilized
- Pronto would administer and manage the charter service
- Fixed Contract Price: **\$110,000**
- 3% annual adjustment

This pricing remains more than 10% below what OCF paid in 2025 and reflects a demand-driven provisioning model based on actual hourly ridership data.

We received a response from KB on 03-03-2026 (Exhibit B.5):

Hello Kumar,

Thank you for reaching out. Option 1 is a no go. As I have said numerous times, we will not trim our trees. Option 2 is doable, if LTD is willing to lease Pronto their vehicles. LTD

is a local entity that has the ability to service our event because their vehicles can handle our site, no tree trimming required. I have cc'd LTD on this email to get confirmation that this is even an option for them.

As for a three-year contract, we would want to see if you can provide the service efficiently the first year before signing a three-year contract.

*Have a nice day,
Kirsten Bolton*

C. LTD's Request to operate the OCF Shuttle Service should be denied

We have provided significant and compelling evidence and documentation of our extensive engagement with the client over the past several months:

- a) Reviewed and analyzed the OCF shuttle service requirements
- b) Conducted a detailed analysis of the historical data for the OCF shuttle service for the past 3 years – 2023, 2024, and 2025:
 - a. This data was provided to Pronto by LTD in response to our CPRA requests (Exhibits 1.6, 1.7, A.8, A.8.1, A.9, 1.10)
 - b. We presented to OCF two options based on this analysis showing how the OCF shuttle services could be operated more efficiently by making it more demand-responsive and configured to meet the detailed demand model we developed for each of the three days of the OCF event.
 - c. We presented to OCF a proposal to operate the shuttle service using a) private motorcoaches, or b) transit buses.
 - d. Per our model, we can deliver the services using either option for a price that is more than 10% below what OCF paid LTD in 2025
- c) We have outlined for OCF several other options to broaden their services with Intercity services and with multiple routes to serve other cities in OCF's vicinity

LTD has established no basis for its statement that 'A charter provider that fails to contact or pursue services with the Customer may be treated as non-responsive under 604.9'. While not naming Pronto as the 'charter provider' in this statement, it is clear that LTD has directed this comment at Pronto. For LTD to make such a statement and assertion about Pronto and to use it as the justification for LTD to provide the requested service directly is a violation of the FTA Charter Rule.

D. Invocation of §604.8 Leasing Provision

On 03-03-2026, we presented to OCF two options: 1) Private Motorcoaches and 2) Transit Buses. OCF rejected option a) (Exhibit B.5) and indicated:

Option 2 is doable, if LTD is willing to lease Pronto their vehicles.

OCF / KB reiterated the same message in her email dated 03-16-2026 (Exhibit B.6):

We just want shuttle service.

Hence, we formally invoked the leasing provision under 49 C.F.R. §604.8 and submitted a request to LTD for:

- Articulated buses
- Operators; and
- Supervisory staff.

(Exhibits A.13.1, A.13.2, A.13.3)

E. LTD's Denial Without Substantive Explanation

On March 3, 2026, LTD declined Pronto's leasing request – Exhibit A.14 - stating only that the request did not meet the requirements of §604.8.

LTD did not identify:

- Which specific requirement(s) of §604.8 were not satisfied; or
- Any factual basis for its determination.

LTD's own Charter Service Policy (Exhibit A.17) cites its policy for Leasing of Equipment and Driver that LTD is allowed to lease its FTA-funded equipment and drivers to registered charter providers for charter services only if the following conditions exist:

- a. The private charter operator is registered on the FTA charter registration Web site
- b. The registered charter provider owns and operates buses or vans in a charter service business
- c. The registered charter provider received a request for charter service that exceeds its available capacity either of the number of vehicles operated or the number of accessible vehicles operated by the registered charter provider and
- d. The registered charter provider has exhausted all of the available vehicles of all registered charter providers in LTD's geographic service area.

Pronto has met each and every condition set forth in 49 C.F.R. §604.8(a), as well as the corresponding criteria articulated in LTD's own Charter Service Policy (Exhibit A.17). LTD has identified no specific deficiency in Pronto's leasing request under any of these elements.

F. Follow-Up Requests and Lack of Response

Pronto submitted follow-up communications on March 5 and March 10 requesting clarification of LTD's position (**Exhibits A.13.2, A.13.3**). LTD did not provide any substantive response.

G. LTD's denial of leasing of equipment and drivers to Pronto is discriminatory and self-serving

LTD has been operating the OCF shuttle services for the past 20+ years. For the 2026 OCF event, Pronto has responded affirmatively to LTD's charter notice. We have established conclusively that we are ready, willing, and able to provide the service. Since OCF / KB has rejected the option to use motor coaches, the delivery of the service requires transit buses to meet the client's needs. LTD has met the need for 20+ years and has indicated its willingness to do so for the 2026 OCF event as well, but only to OCF directly, while declining Pronto's leasing request. By doing so, LTD is a) exhibiting discriminatory practice and behavior, and b) denying Pronto's rights to open, fair and equal access to the federal funded equipment while extending that access to OCF.

We have presented evidence that LTD's behavior and conduct are self-serving and designed to promote LTD as the provider of OCF Shuttle Services by blocking Pronto from operating the services. LTD issued the Charter Notice in December 2025 – as it has done in years past – for these services. It is now denying access to the federally funded equipment to Pronto and while doing so stating that Pronto does not have the capacity to meet the requirements for the service.

LTD is the steward for the equipment it operates, and it does so on behalf of the public. Its denial of Pronto's request to lease the equipment, LTD is acting as the 'owner' of the equipment and not its steward. No government agency or entity has conferred upon LTD the right to a) 'own' the equipment and b) deny Pronto's request to lease equipment selectively, arbitrarily, and discriminatorily and in a manner that is self-serving.

LTD's selective denial of access to federally funded equipment—while maintaining its willingness to deploy those same assets for the same service—raises serious concerns regarding unequal and discriminatory treatment.

Federally funded assets are held in trust for public purposes and must be administered in a manner consistent with federal law. A recipient may not selectively withhold access to such assets in a manner

that disadvantages a registered charter provider while preserving the recipient's own ability to perform the service.

III. ARGUMENT

A. LTD Does Not Meet the Requirements of §604.9

Section 604.9 permits a recipient to provide charter service only under narrowly defined conditions, including where no registered provider is "willing and able."

Here, the record establishes that Pronto:

- Responded affirmatively to the charter notice;
- Engaged extensively with the client;
- Developed and presented operational plans; and
- Remains ready, willing, and able to perform.

LTD's attempt to invoke §604.9 is not merely unsupported - it is precluded by the record. The regulatory standard is not whether a recipient believes a provider is optimal or preferable, but whether a registered charter provider is "willing and able." Pronto has demonstrated both through documented engagement, operational planning, and formal invocation of §604.8.

A recipient may not manufacture ineligibility under §604.9 by (i) denying access to necessary federally funded assets, and then (ii) asserting that the resulting constraint renders the provider incapable.

B. LTD's Interpretation of §604.8 Is Structurally and Legally Deficient

LTD asserts that §604.8 is discretionary because it uses the term "may."

While leasing is not mandatory in every instance, such discretion must be exercised such that it is consistent with:

- The statutory prohibition on recipient-provided charter service; and
- The overarching purpose of Part 604.

LTD's interpretation would permit a recipient to:

1. Decline leasing request by private operators;
2. Declare private providers incapable; and
3. Provide the service directly.

This interpretation nullifies the Charter Service Rule.

Finally, LTD's Request for Advisory Opinion should be viewed in context. The issues presented are not abstract questions of regulatory interpretation. They arise from a concrete set of actions taken by LTD in connection with a specific charter service request.

Accordingly, any interpretation adopted by FTA should be grounded in the factual record and should not enable a recipient to deny leasing, impede a qualified provider, and subsequently position itself to provide the same service.

C. LTD's Redefinition of "Capacity" Is Unsupported

LTD asserts that Pronto lacks capacity because it sought to utilize leased equipment.

This argument is inconsistent with §604.8, which expressly contemplates:

- Situations where demand exceeds a provider's fleet;
- Situations where federally funded equipment operated by the recipient is the only viable option to meet the client's / public needs; and
- The use of leasing to bridge that gap.

Pronto's actions fall squarely within the regulatory framework.

D. LTD's Conduct Constitutes Interference with the Charter Process

The record demonstrates a pattern of conduct by LTD that interfered with the Charter Rule process, including:

- Influencing client behavior and creating friction between the client and Pronto;
- Encouraging withdrawal by the charter provider; and
- Withholding leasing while preserving its own ability to provide service

Such conduct is inconsistent with the neutrality required of a recipient.

The Charter Service Rule presumes a neutral role for recipients in administering the notice and response process. LTD's conduct—both through written communications to the customer and verbal communications to Pronto—departed from that neutral role and instead influenced the outcome of the procurement process.

Such conduct is inconsistent with the structure and purpose of Part 604, which is designed to ensure that private charter providers are afforded a fair and meaningful opportunity to perform requested services.

E. Pronto Has Demonstrated the Requisite Ability, Willingness and Readiness

Pronto conducted a detailed analysis of three years of LTD-provided data, including:

- Hourly ridership;
- Demand peaks;
- Cycle times; and
- Vehicle utilization.

Based on this analysis, Pronto developed a demand-responsive plan requiring:

- Friday: 6 articulated buses
- Saturday: 7 articulated buses
- Sunday: 6 articulated buses

This plan:

- Meets demand with a 10% buffer;
- Improves utilization of the equipment significantly; and
- Reduces cost by more than 10%.

This analysis is backed by 20+ years of our experience in providing charter services and 15+ years of providing large scale shuttle services – like San Francisco 49ers home games since 2010, large scale concerts, and other public events. We have an exemplary record of providing Safe. Dependable.

Comfortable. service:

- 60,000+ trips
- 2.5M+ passengers
- 100% injury-free

We – Pronto – are ready, willing, and able to operate the OCF shuttle service.

IV. CONCLUSION

This matter presents a clear application of the Charter Service Rule:

- A registered provider responded and is ready, willing, and able;

- The recipient has been providing its equipment, drivers, and supervisory staff for OCF for 20+ years – the same event for which Pronto has requested LTD to lease its equipment, drivers, and supervisory staff;
- The recipient denied leasing without justification and even though we have met all the stated conditions listed in LTD's own Charter Policy;
- While denying Pronto its rights to lease the equipment, the recipient is simultaneously and concomitantly seeking to provide the service directly, which represents a conflict of interest

FTA should make the following determinations:

- That §604.9 is inapplicable where a registered charter provider has responded and demonstrated willingness and capability
- That §604.8 may not be applied in a manner that prevents a qualified provider from performing service while enabling a recipient to do so
- That LTD's denial of Pronto's leasing request was unsupported by the requirements of §604.8
- That LTD's actions interfered with the proper operation of the Charter Service Rule

Accordingly, Pronto respectfully requests that FTA:

1. Deny LTD's request to provide the charter service directly;
2. Direct LTD to comply with the Charter Service Rule in its administration of this matter;
3. Confirm Pronto's rights to open, fair and equal access to the federally funded LTD equipment and the rights to lease the equipment, drivers, and supervisory staff to operate the OCF shuttle services;
4. Overturn LTD's denial of leasing request initiated by Pronto; and
5. Take such further action as FTA deems appropriate to ensure compliance.

Respectfully submitted,

Kumar Shah

President

Pronto Journeys

FTA Charter Registration ID: 6643

Pronto Corporation

Pronto Group Transportation Network (GTN) - The Network Model for Group Transportation

84 W Santa Clara St, Suite 700, San Jose, CA

650.249.7400 | www.ProntoJourneys.com | www.ProntoExperiences.com

kumar accelar.com

From: Bret Smith <Bret.Smith@ltd.org>
Sent: Wednesday, December 24, 2025 10:40 AM
To: Bret Smith
Subject: 2026 Oregon Country Fair charter posting
Attachments: 2026 Oregon Country Fair Charter posting.pdf

In compliance with FTA rules 49 CFR Ch. VI 604.14 Lane Transit District is providing notice to registered private charter providers on behalf of the Oregon Country Fair (OCF). Lane Transit District is reaching out to registered private charter providers to determine interest to provide charter shuttle service between the park and ride and the event venue.

Lane Transit District has interest in providing this service if there are no registered charter providers who show interest to provide this service.

Thank you,

Bret Smith

Lane Transit District
Senior Service Planner
P:541-682-6191 | F: 541- 682-6111
Contact us at ltd.org



Exhibit A.3

December 24th , 2025

In compliance with FTA rules 49 CFR Ch. VI 604.14 Lane Transit District is providing notice to registered private charter providers on behalf of the Oregon Country Fair (OCF). Lane Transit District is reaching out to registered private charter providers to determine interest to provide charter shuttle service between the park and ride and the event venue. Lane Transit District has interest in providing this service. Lane Transit District will be charging \$296 per service hour if the service is provided by Lane Transit District.

If you are willing and able to provide all service as listed below, please respond to Lane Transit District within 14 days of the listed date of this notice.

Event Name: 2026 Oregon Country Fair

<https://www.oregoncountryfair.org/>

Event Organizer Contact Information:

Kristen Bolton, Oregon Country Fair
442 Lawrence Street, Eugene OR 97401
Telephone: 541-935-7240
Email: kbolton@oregoncountryfair.org

Agency Contact Information:

Bret Smith, Lane Transit District
3500 East 17th Avenue, Eugene, Oregon
Telephone: 541-682-6191
Email: bret.smith@ltd.org

Service Dates:

July 10 - 12, 2026

Service hours:

Service would operate:

July 10 – 12, 2026, 10:00 am to 9:00 pm

Buses begin service from Downtown Eugene and Valley River Center at 10 a.m.; last departure from the Oregon Country Fair venue (44.055956, -123.373567) leaves at 9:00 p.m.

Service Details:

The Oregon Country Fair (OCF) desires an efficient and affordable transit service for fairgoers to travel by bus to and from the Oregon Country Fair during the event July 10, 11, and 12, 2026. Transit service to the OCF supports the City of Eugene's and Lane County's Climate action plans by reducing problems caused by traffic congestion, vehicle pollution, parking issues, and noise, as well as ensures equity of access to the event for all.



P.O. Box 7070, Springfield, OR 97475-0470 | 3500 E. 17th Ave., Eugene, OR 97403

P 541-687-5555 | **F** 541-682-6111 | 7-1-1 TTY | LTD.org



Advisory Opinion Request Form

An interested party may request an advisory opinion from the Chief Counsel on a matter regarding specific factual events only. This form is NOT for Cease and Desist requests. FTA has created a separate form for those requests. Please print out the form below and submit to docket FTA-2007-0023 at <http://www.regulations.gov>. Failure to submit to the docket will mean that FTA cannot consider your request.

1. The undersigned submits this request for an advisory opinion from the FTA Chief Counsel with respect to:

LTD seeks confirmation that a Recipient may deny a § 604.8 lease request when a charter provider lacks capacity or fails to meet regulatory requirements, and that such denial is discretionary. It further asserts that a provider's failure to pursue the customer may be treated as non-responsiveness under § 604.9. In these circumstances, the Recipient may provide the charter service directly.

Enter information here. **PLEASE SEE THE ATTACHED DOCUMENT.**

3. Do you affirm that the undersigned swears, to the best of his/her knowledge and belief, this request includes all data, information, and views relevant to the matter, whether favorable or unfavorable to the position of the undersigned, which is the subject of the request?

☒ Yes

☐ No

4. Please certify the following: "I hereby certify that I have this day served the foregoing document on the following addresses and e-mail or facsimile numbers (if also served by e-mail or facsimile) by:

X Electronic Filing with Agency – by submitting the Request for Advisory Opinion through the agency's designated electronic filing system or email portal, in accordance with applicable regulations.

X U.S. Mail – by placing a copy in the United States mail, postage prepaid, addressed as follows:

Starline Luxury Coaches
9801 Martin Luther King Jr Way S
Seattle, WA 98118

Pronto Journeys
Attn: Kumar Shah, President
84 W Santa Clara Street, Suite 700
San Jose, CA 95113

The Oregon Country Fair
Attn: Kristen Bolton, Executive Director
442 Lawrence Street
Eugene, OR 97401

X Email – by transmitting a copy via electronic mail to the email addresses listed below:

Email: Kumar@ProntoJourneys.com
Email: kbolton@oregoncountryfair.org
Email: hollie@starlinecollection.com

FTA Electronic Filing: Docket FTA-2007-0023 at <http://www.regulations.gov>.

12016-02-0111:32:33

Lane Transit District

By: 
Jameson Auten
Chief Executive Officer
3500 E. 17th Avenue
Eugene, OR 97403
(541) 682-6105
Jameson.Auten@ltd.org

* * * Please keep in mind that **ALL** field are required. Failure to provide the requested information could result in a delay in the processing time of your request.



April 7, 2026

Chief Counsel
Federal Transit Administration
1200 New Jersey Ave., SE
West Building, Ground Floor, Room W12-140
Washington, DC 20590

Via First Class Mail

Via Email: ombudsman.charterservice@dot.gov

Electronic Filing: Docket Submission: FTA-2007-0023 at <http://www.regulations.gov>.

**Re: Request for EXPEDITED Advisory Opinion Pursuant to 49 C.F.R. § 604.18:
Application of 49 C.F.R. §§ 604.8 and 604.9**

Dear Chief Counsel:

The undersigned submits this request for an advisory opinion from the FTA Chief Counsel with respect to request for bus services for the Oregon County Fair, a duly registered Oregon non-profit corporation ("Customer" or "OCF").

Lane Transit District ("LTD") is a duly organized mass transit district, pursuant to Oregon Revised Statutes Chapter 267, and constitutes a political subdivision and municipal corporation of the State of Oregon. LTD operates throughout Lane County, Oregon. LTD is a Recipient of Federal Transit Administration ("FTA") funds and, thus, qualifies as a "Recipient" pursuant to 49 C.F.R. § 604.3(r).

As a Recipient of FTA funds, LTD is subject to the charter service restrictions set forth in 49 U.S.C. § 5323(d) and 49 C.F.R. Part 604 and as a Recipient, LTD is generally prohibited from providing charter service except under limited regulatory exceptions. Two of these exceptions are relevant to the issue presented here, which arises from a request to provide bus services for the Oregon County Fair, and are partially cited below (emphasis added):

§ 604.8(a) A Recipient *may* lease its FTA-funded equipment and drivers to registered charter providers for charter service only if the following conditions exist:

[. . .]

(4) The registered charter provider has exhausted all of the available vehicles of all registered charter providers in the Recipient's geographic service area.

§ 604.9

When no registered charter provider responds to notice from a Recipient.

(a) A Recipient may provide charter service, on its own initiative or at the request of a third party, if no registered charter provider responds to the notice issued in § 604.14:

- (1) Within 72 hours for charter service requested to be provided in less than 30 days; or
 - (2) Within 14 calendar days for charter service requested to be provided in 30 days or more.
- (b) A Recipient shall not provide charter service under this section if a registered charter provider indicates an interest in providing the charter service set out in the notice issued pursuant to § 604.14 and the registered charter provider has informed the Recipient of its interest in providing the service.

The Oregon County Fair requested service for the 2026 event to occur on July 10, 11, and 12. The requested service hours are from 10:00 am to 9:00 pm each day of the event. Buses begin service from Downtown Eugene and Valley River Center at 10 a.m.; and the last departure from the Oregon Country Fair venue leaves at 9:00 p.m. The Customer is seeking a minimum of 20 vehicles for this service.

By reference, in 2025, shuttles transported 12,230 passengers over the three-day event. Based on previous years, the Customer estimates that it will require a minimum of 20 full size buses with ADA capabilities along with ground crew to load and unload buses at each location to maintain 15-minute frequency between the park and rides and the park venue. In 2025 the 20 buses accumulated 464 service hours over the 3-day event.

LTD desires to provide bus service for this long-standing community event. Therefore, LTD duly issued a notice pursuant to 49 C.F.R. § 604.14 for charter transportation services requested by the Customer ("Notice"). Two registered charter services submitted a response; One registered charter provider ("Provider A") expressed interest but subsequently determined it could not perform the service using its own equipment due to operational constraints and requested to lease LTD's vehicles and potentially operators under § 604.8. A second registered charter provider: ("Provider B"), submitted a response to the Notice but failed to follow up with or contact the Customer regarding provision of the service.

LTD declined Provider A's request to lease our vehicles and operators citing deficiencies in the request, as LTD's interpretation is that § 604.8 is permissive ("may"), not mandatory. Additionally, Provider A, in their § 604.8 request to LTD, stated that they do not currently own equipment necessary to safely transport passengers on the topography of the route without the removal of trees, and included the following information in its request:

"After exhausting available private motor coach options and in light of site-specific constraints communicated by the event organizer, using motorcoaches for OCF is not a viable option because OCF is unwilling to make requisite changes to make the OCF shuttle route safe for motorcoach travel and for the passengers. At this point, we have exhausted all available private options and we are formally invoking the leasing provisions under the FTA Charter Service Rule (49 CFR Part 604), which contemplate the leasing of vehicles and/or operators from a Recipient agency when necessary to provide the requested charter service."

We believe that § 604.8 is permissive, not mandatory, and does not mandate that LTD lease its equipment or operators and, furthermore, LTD is not obligated to investigate that the regulatory

conditions have been met or sufficiently documented. Provider A did NOT provide any supporting documentation with their § 604.8 request to LTD. A charter provider that cannot perform service using its own resources, and instead relies on the recipient's federally funded assets, raises concerns regarding circumvention of the statutory prohibition in 49 U.S.C. § 5323(d).

Secondly, Provider B has neither provided a substantive response to the Customer or submitted a written request to withdraw as of the date of this letter. The Oregon County Fair is scheduled to occur on July 10, 11, and 12. Given the scale and fixed dates of this event, the Customer must secure transportation services as soon as possible. Adequate advance planning is essential, as any registered provider—including LTD—requires sufficient lead time to allocate resources, coordinate logistics, and ensure the availability of approximately 20 vehicles for a multi-day event. Failure to finalize arrangements promptly may significantly impact the ability to meet transportation needs for the event.

It is our understanding and belief that mere expression of interest—without follow-through—is not a commercially reasonable quote deemed responsive to the Notice; and, therefore, § 604.9, allows LTD to provide service where no registered charter provider effectively responds or performs, and that a nominal or incomplete response should not preclude this exception.

Here, two Service Providers responded to the Notice, yet neither has the capacity to provide the service posted by Oregon County Fair. Provider A is incapable of performance without substantial reliance on Recipient-owned equipment and/or personnel; and Provider B failed to meaningfully respond or pursue the opportunity; and there is no registered charter provider is practically able to perform the requested charter service. Under these facts, 49 C.F.R. § 604.9, and the additional guidance provided in the “FTA Q&A (2008)”, we believe that LTD may step back in to provide services to the Oregon County Fair. This event, has been a long-standing tradition of this community, which LTD has proudly supported since 1990. While it is our desire to provide bus service in 2026, using our vehicles and operators under our protocol and control, we are equally committed to following FTA regulations and, therefore, respectfully seek your guidance in these unique circumstances.

Accordingly, LTD respectfully requests that the FTA Chief Counsel confirm our understanding that:

1. A Recipient may deny a § 604.8 lease request where the provider lacks independent capacity and has not satisfied regulatory prerequisites; and “may” provides discretion to a Recipient to reject a request pursuant to this exemption;
2. A charter provider that fails to contact or pursue service with the Customer may be treated as non-responsive under § 604.9; and
3. Under these combined circumstances, the Recipient may provide the requested charter service directly.

Affirmation

I hereby certify that, to the best of my knowledge and belief, this request includes all data, information, and views relevant to the matter, whether favorable or unfavorable to Recipient's position. Recipient has served this request in accordance with 49 C.F.R. § 604.18.

Respectfully submitted,



Jameson Auten
Chief Executive Officer

*Certificate of Service
Follows on Next Page*

Exhibit A.4

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing **Request For Advisory Opinion Pursuant to 49 C.F.R. § 604.18** and **Advisory Opinion Request Form** on the following addresses and e-mail addresses:

X **Electronic Filing with Agency** – by submitting the Request for Advisory Opinion through the agency's designated electronic filing system or email portal, in accordance with applicable regulations.

X **U.S. Mail** – by placing a copy in the United States mail, postage prepaid, addressed as follows:

Starline Luxury Coaches
9801 Martin Luther King Jr Way S
Seattle, WA 98118

Pronto Journeys
Attn: Kumar Shah, President
84 W Santa Clara Street, Suite 700
San Jose, CA 95113

The Oregon Country Fair
Attn: Kristen Bolton, Executive Director
442 Lawrence Street
Eugene, OR 97401

X **Email** – by transmitting a copy via electronic mail to the email addresses listed below:

Email: Kumar@ProntoJourneys.com
Email: kbolton@oregoncountryfair.org
Email: hollie@starlinecollection.com

DATED this 7 day of April, 2026.

/s/ Patrick Fiedler
Senior Paralegal
Lane Transit District
3500 W 17th Avenue
Eugene, OR 97403
(541) 682-3224
Email: patrick.fiedler@ltd.org

Re: Lane Transit District-Request for Advisory Opinion Form and Request for EXPEDITED Advisory Opinion

From Charterservice Ombudsman (FTA) <ombudsman.charterservice@dot.gov>

Date Tue 2026-04-28 07:01

To Patrick Fiedler <Patrick.Fiedler@ltd.org>

Cc Kumar Shah <kumar@prontojourneys.com>; kbolton@oregoncountryfair.org <kbolton@oregoncountryfair.org>; hollie@starlinecollection.com <hollie@starlinecollection.com>; Carmen Jackson-Brown <Carmen.Jackson-Brown@ltd.org>; Miller, Micah (FTA) <micah.miller@dot.gov>; Lynch, John (FTA) <john.lynch@dot.gov>

Dear Mr. Fiedler:

Re: Advisory Opinion 2026-01

On April 7, 2026, Lane Transit District requested an Advisory Opinion from the Federal Transit Administration (FTA) on two issues: 1) the requirements for leasing a vehicle to a charter provider pursuant to 49 CFR 604.8, and 2) when a grantee may step in and provide charter service if a charter provider does not follow up on the initial notice of interest in 49 CFR 604.9. On April 13, 2026, Pronto Charter Service Company (Pronto) responded to the request for an Advisory Opinion claiming that LTD failed to provide adequate justification for its denial of Pronto's lease request and that LTD was therefore required to lease its vehicles to Pronto.

LTD's request for an advisory opinion is denied. **An advisory opinion is not necessary in this instance, as the questions asked are adequately covered by the charter regulations.** See 49 CFR 604.18(d)(3).

Background

The Oregon County Fair requested service for its 2026 fair, which occurs on July 10, 11, and 12. LTD desires to provide bus service for this event. LTD issued a notice pursuant to 49 C.F.R. § 604.14 for charter transportation services requested by the Oregon State Fair. Two registered charter services submitted a response; one registered charter provider, Pronto, expressed interest but subsequently determined it could not perform the service using its own equipment due to operational constraints and requested to lease LTD's vehicles and potentially operators under § 604.8. LTD denied Pronto's request to lease its vehicles. A second registered charter provider submitted a response to the Notice but failed to follow up with or contact the Oregon State Fair regarding the service.

LTD is seeking clarity regarding its ability to deny Pronto's lease request and its ability to step back in and provide the service. As noted above, 49 CFR § 604.8 and Q&A's in 49 CFR 604 Appendix C adequately address these questions.

49 CFR § 604.8 provides in pertinent part that:

(a) A recipient may lease its FTA funded equipment and drivers to registered charter providers for charter service only if the following conditions exist:

- (1) The private charter operator is registered on the FTA charter registration Web site;
- (2) The registered charter provider owns and operates buses or vans in a charter service business;

- (3) The registered charter provider received a request for charter service that exceeds its available capacity either of the number of vehicles operated by the registered charter provider or the number of accessible vehicles operated by the registered charter provider; and
- (4) The registered charter provider has exhausted all of the available vehicles of all registered charter providers in the recipient's geographic service area.

<https://www.transit.dot.gov/regulations-and-guidance/access/charter-bus-service/charter-bus-service-rule-and-guidance>

Since the regulations give the recipient discretion to lease a federally-funded asset to a private operator (or not), FTA is not implicated further in these decisions, nor can it require a recipient to lease its equipment to private operators. It is a local decision. Whether a recipient wishes to lease its vehicles to a private charter operator is entirely up to the recipient. **In other words, the regulations do not require a recipient to lease its vehicles to a private charter operator.**

As to the second question raised by LTD regarding when it may step back in and perform the service if a charter provider expresses interest. 49 CFR 604 Appendix C, question 49 addresses this scenario.

(49) Q: What happens if a registered charter provider indicates interest in providing the service, but then does not contact the customer?

A: A transit agency may step back in and provide the service if the registered charter provider was the only one to respond affirmatively to the notice.

<https://www.govinfo.gov/content/pkg/CFR-2011-title49-vol7/pdf/CFR-2011-title49-vol7-part604-appC.pdf>

In this instance, two charter providers responded to the initial notice for service. The first provider, Pronto, does not have the necessary vehicles to provide the service. The second provider never contacted the Oregon State Fair to discuss the terms of the service. Therefore, LTD is allowed to step back in and provide the service.

Sincerely,



Kathy Breeden
CHARTER OMBUDSMAN
Office of Chief Counsel
Federal Transit Administration
U.S. Department of Transportation
Ombudsman.Charterservice@dot.gov

On Tue, Apr 7, 2026 at 6:06 PM Patrick Fiedler <Patrick.Fiedler@ltd.org> wrote:

Lane Transit District hereby submits the attached **Request for Advisory Opinion Form and Request for Expedited Advisory Opinion Pursuant to 49 C.F.R. § 604.18**, concerning the application of 49 C.F.R. §§ 604.8 and 604.9 (Charter Services).

An original version of both documents has also been electronically filed under docket number FTA-2007-0023 at <http://www.regulations.gov>.

Please let us know if any additional information is required. Thank you for your consideration.

Patrick Fiedler

Compliance | Senior Paralegal

P: 541-682-3224



Disclaimer: This message, including any attachments, is confidential and may be legally privileged. It is intended solely for the designated recipient(s). If you are not the intended recipient, please notify the sender immediately and delete this message from your system. Any unauthorized access, use, disclosure, or distribution of this communication is strictly prohibited. Additionally, this email and any attachments do not constitute legal advice. I am not an attorney and cannot provide legal opinions or representation. Any statements made in this email should not be relied upon as legal guidance. Thank you.

Exhibit A.5

kumar accelar.com

From: kumar accelar.com
Sent: Friday, December 26, 2025 8:12 AM
To: 'Bret Smith'
Cc: Customer Service
Subject: RE: 2026 Oregon Country Fair charter posting

Greetings Bret & Happy Holidays,

Thank you for sharing with us this charter posting. We are a registered with the FTA as a Charter Bus provider to offer services nationwide. We are ready and able to cover the services for the 2026 Oregon County Fair. Kindly put us in contact with the appropriate authorities who have requested these services so we can work out the logistics with them.

Best regards,
Kumar

Kumar Shah
President & CEO
Accelar, Inc.
84 W Santa Clara St
Suite 700
San Jose, CA 95113
kumar@accelar.com
650.249.7418 (w)
408.472.5662 (mobile)

From: Bret Smith <Bret.Smith@ltd.org>
Sent: Wednesday, December 24, 2025 10:40 AM
To: Bret Smith <Bret.Smith@ltd.org>
Subject: 2026 Oregon Country Fair charter posting

In compliance with FTA rules 49 CFR Ch. VI 604.14 Lane Transit District is providing notice to registered private charter providers on behalf of the Oregon Country Fair (OCF). Lane Transit District is reaching out to registered private charter providers to determine interest to provide charter shuttle service between the park and ride and the event venue.

Lane Transit District has interest in providing this service if there are no registered charter providers who show interest to provide this service.

Thank you,

Bret Smith
Lane Transit District
Senior Service Planner
P:541-682-6191 | F: 541- 682-6111
Contact us at ltd.org



LTD Triennial Review, Butte-to-Butte Charter Service violations

From Kumar Shah <kumar@prontojourneys.com>

Date Sun 2026-04-26 16:19

To Jameson Auten <Jameson.Auten@ltd.org>

Cc Bret Smith <Bret.Smith@ltd.org>; Eric Breitenstein <Eric.Breitenstein@ltd.org>; Dave Roth <Dave.Roth@ltd.org>; Heather Lindsay <Heather.Lindsay@ltd.org>; Carmen Jackson-Brown <Carmen.Jackson-Brown@ltd.org>

Jameson,

While I appreciate that you are seeking clarification, I must point out that the FTA's 2024 Triennial Review already provided clear guidance on this type of activity. Specifically, the findings regarding the Butte-to-Butte shuttle identified that providing exclusive, event-specific service—even under the guise of public transit—violates the Charter Rule.

The [Lane Transit District \(LTD\)](#) audit findings regarding the Butte-to-Butte race are a prime example of an agency attempting to classify a charter-like event as "public service" to bypass federal restrictions. In their [2024 Triennial Review](#), the FTA flagged the Butte-to-Butte shuttle as a specific deficiency under the [Charter Bus Service](#) rules.'

Specific Violations: The Butte-to-Butte Shuttle

The race shuttle, which operates on July 4th each year, was found to violate [49 CFR Part 604](#) for several reasons:

- **Exclusive Service at a Negotiated Price:** LTD provided a dedicated [Route 971X shuttle](#) that ran every 5–10 minutes specifically for race participants and spectators. Open for Business Eugene
- **Selective Fare Treatment:** The service was free for Butte-to-Butte attendees, while the rest of the city operated on a Sunday schedule with standard fares. Providing free service to a specific event's attendees is a hallmark of a prohibited charter. Open for Business Eugene
- **Third-Party Request:** The service was requested by the Oregon Track Club (the event organizer) for the exclusive use of their participants, which the FTA defines as charter service.

Corrective Actions To Be Taken by LTD

Following the FTA's final report in August 2024, LTD was given 120 days to submit and implement corrective actions:

- **Policy Revision:** LTD had to update its internal [Charter Bus Service policy](#) to ensure that future special event shuttles do not provide exclusive access or special fare structures that compete with private operators.
- **Mandatory Training:** LTD compliance staff were required to attend [FTA Charter Bus workshops](#) to better identify when "special event service" crosses the line into prohibited charter activity. CALACT
- **Audit Reporting:** LTD must now [explicitly report any charter exceptions](#) it uses (such as for government officials or non-profit organizations) to the Oregon Department of Transportation (ODOT) and the FTA to maintain oversight.

By denying Pronto's \$604.8 request while simultaneously preparing to run the OCF service directly, LTD is repeating the exact 'deficiency' the FTA ordered you to correct. We would prefer to resolve this locally, but we are prepared to include these documented compliance failures in our formal FTA supplement to ensure the record is complete.

Best regards,
Kumar

From: Jameson Auten <Jameson.Auten@ltd.org>
Sent: Monday, April 20, 2026 2:53 PM
To: Kumar Shah <kumar@prontojourneys.com>
Cc: Bret Smith <Bret.Smith@ltd.org>; Eric Breitenstein <Eric.Breitenstein@ltd.org>; Dave Roth <Dave.Roth@ltd.org>; Heather Lindsay <Heather.Lindsay@ltd.org>; Carmen Jackson-Brown <Carmen.Jackson-Brown@ltd.org>
Subject: Re: [External Sender]OCF Shuttle Service – Path Forward

Mr. Shah-

LTD has reached out to the FTA for clarification on the matter. LTD's understanding is that we are not required to lease vehicles or people. We will look to expedite the guidance for resolution.

Thank you,

Jameson

Get [Outlook for iOS](#)

From: Kumar Shah <kumar@prontojourneys.com>
Sent: Monday, April 20, 2026 5:44:48 PM
To: Jameson Auten <Jameson.Auten@ltd.org>
Cc: Bret Smith <Bret.Smith@ltd.org>; Eric Breitenstein <Eric.Breitenstein@ltd.org>; Dave Roth <Dave.Roth@ltd.org>; Heather Lindsay <Heather.Lindsay@ltd.org>
Subject: [External Sender]OCF Shuttle Service – Path Forward

You don't often get email from kumar@prontojourneys.com. [Learn why this is important](#)

EXTERNAL SENDER: This message originated outside of Lane Transit District. Unexpected messages should be verified before links or attachments are opened.
--

Dear Jameson,

I wanted to reach out directly regarding the Oregon Country Fair shuttle service.

As things stand, the regulatory process now underway - the request for advisory opinion LTD has filed and the complaint we have filed with the FTA - could take up to ~75 days. During that time, OCF and the community will have no clear guidance on shuttle service, which will almost certainly impact attendance for this flagship event. That outcome would not reflect well on any of the parties involved and certainly not in the best interest of the local community and OCF who has been hosting this event for the past 20+ years. As I am sure you have seen from the correspondence, there is nothing Kirsten and OCF would like more than for LTD and Pronto to work together to deliver the shuttle service, which she needs for her event.

We have worked diligently with Kirsten and her team to develop two viable solutions— one with motor coaches and one with transit buses - both compliant and both delivering meaningful cost savings. We are ready to execute on either option immediately and are simply awaiting OCF's direction.

What we do not understand—and the frustration and consternation OCF has also expressed—is LTD's adversarial position on leasing LTD's equipment and drivers to Pronto. LTD has supported this same event with vehicles and operators for over 20 years. You have the equipment and drivers available for the event, and you have communicated to OCF that you are ready to operate the shuttle service directly - like you have done in prior years. The situation is different this year since we have made a firm commitment to OCF to provide the shuttle service. Taking an adversarial position now to leasing equipment and drivers to Pronto, particularly in a way that is inconsistent with the Charter Rule, creates unnecessary friction and, if it becomes more widely understood, may not reflect well for LTD from a community relations standpoint.

As the President and CEO of Pronto Corporation - and a fellow executive in the passenger transportation industry - I am troubled that you are ready to operate the service on your own, but LTD is opposed to lease your equipment and drivers to another operator, who has 20+ years of experience in delivering charter services and 15+ years of experience in delivering shuttle services for large scale public events - like San Francisco 49ers and for universities for their football games, and for major concerts. We have reached out to your team several times to understand their concerns about leasing equipment and drivers to Pronto. They have not shared with us their concerns.

This stand-off does not serve OCF, the community, or LTD well.

We are quite confident of the case we have made to the FTA. Should FTA rule in our favor and cite LTD for violation of the federal law that would reflect poorly on all parties concerned that LTD and Pronto executives were not able to find a way to work together and had to turn to the Federal authorities to resolve the matter.

We believe there is a straightforward path forward if we work together. I would welcome the opportunity to speak with you directly to understand your concerns so I can address and resolve them. Let me know a convenient time for a zoom meeting. If you'd rather meet in person, let's find a mutually convenient time and place to meet. I would be happy to host you in our wonderful city of San Francisco - or visit you in Eugene.

I am hopeful that we can work out our differences when we meet. When we do, we will withdraw the complaint we have filed with the FTA immediately and use the remaining 86 days prior to the OCF to focus on the delivery of the shuttle service. We owe it to OCF / Kirsten and the community.

Respectfully,
Kumar Shah

Exhibit C.2

NOTICE OF FTA CHARTER SERVICE COMPLAINT

1. Complainant Information

Name: Kumar Shah

Title: President

Company: Pronto Journeys

FTA Charter Registration ID: 6643

Address: 84 W Santa Clara St, Suite 700, San Jose, CA 95113

Email: kumar@ProntoJourneys.com

Phone: 650.249.7418 (w) 408.472.5662 (Mobile)

2. Respondent Information

Agency: Lane Transit District (LTD)

Address: 3500 E 17th Avenue, Eugene, OR 97403

Primary Contact: Jameson Auten, CEO

Dave Roth, Director of Mobility Planning and Policy

Bret Smith, Senior Service Planner

Heather Lindsay

Eric Breitenstein

3. Description of the Complaint

This complaint arises under the Federal Transit Administration (FTA) Charter Service Rule (49 C.F.R. Part 604) in connection with the Oregon Country Fair (OCF) 2026 shuttle service.

Accelar, Inc. dba Pronto Journeys ("Pronto"), a registered charter provider, responded affirmatively to LTD's charter notice and engaged in good faith to develop and deliver a compliant and efficient shuttle service plan.

Despite Pronto meeting all requirements under 49 C.F.R. §604.8(a), LTD:

1. **Denied Pronto's request to lease vehicles and operators** under §604.8 without identifying any unmet regulatory condition;
2. **Failed to provide any substantive explanation** in response to follow-up requests for clarification;
3. **Engaged in conduct that interfered with the Charter Service process**, including influencing the client and positioning for Pronto's withdrawal; and
4. **Sought to provide the service directly under §604.9**, despite the presence of a qualified, willing, and able registered charter provider.

These actions collectively constitute violations of the Charter Service Rule and its underlying statutory framework.

4. Factual Basis

A. Charter Notice and Response

LTD issued a charter notice for the OCF shuttle service.

Pronto, a registered charter provider (ID 6643), responded affirmatively and in a timely manner.

B. Engagement and Operational Planning

Pronto:

- Engaged directly with OCF
- Developed multiple service models
- Explored private operator capacity (motorcoach, school bus, hybrid solutions)

- Addressed all operational constraints communicated by OCF
-

C. Invocation of §604.8 Leasing

After exhausting private operator options under the constraints imposed by OCF, Pronto formally requested leasing of LTD vehicles and operators pursuant to §604.8.

Pronto satisfied all required conditions:

- Registered charter provider
 - Operates charter service
 - Received request exceeding capacity under constraints
 - Exhausted available private operators
-

D. LTD Denial Without Basis

On March 3, 2026, LTD denied Pronto's leasing request, stating only that it did not meet §604.8 requirements. LTD did not:

- Identify any specific condition not satisfied;
 - Provide factual support; or
 - Respond to subsequent requests for clarification.
-

E. Interference with Charter Process

LTD engaged in conduct that interfered with the Charter Service process, including:

- Advising the client that Pronto would likely withdraw under certain conditions;
 - Indicating to Pronto that it should notify LTD when it "decides to back down";
 - Communicating to the client that leasing would not be made available to Pronto.
-

F. Attempt to Invoke §604.9

LTD has asserted that it may provide the service directly.

However:

- Pronto responded to the charter notice
- Pronto engaged and developed plans
- Pronto remains ready, willing, and able

Accordingly, §604.9 is not applicable.

5. Violations of 49 C.F.R. Part 604

A. Improper Denial of §604.8 Leasing

LTD denied leasing without identifying any unmet condition under §604.8(a), effectively preventing a qualified provider from performing service.

B. Interference with Charter Service Process

LTD's conduct influenced the client and undermined the neutral administration of the charter process.

C. Improper Attempt to Provide Service Under §604.9

LTD seeks to provide charter service despite the presence of a qualified and responsive charter provider.

D. Inconsistent Application of Charter Rule

LTD's actions create a framework whereby a recipient may:

- Deny leasing;
-

- Declare a provider incapable; and
- Provide the service directly

This is inconsistent with the Charter Service Rule and 49 U.S.C. §5323(d).

6. Harm

LTD's actions have resulted in:

- Obstruction of a qualified charter provider;
 - Risk of unavailability of shuttle service for OCF attendees;
 - Distortion of the competitive process; and
 - Undermining of the Charter Service Rule.
-

7. Relief Requested

Pronto respectfully requests that FTA:

1. **Determine that LTD violated 49 C.F.R. Part 604**
 2. **Find that §604.9 is not applicable in this case**
 3. **Determine that LTD's denial of leasing under §604.8 was unsupported**
 4. **Direct LTD to comply with the Charter Service Rule in its handling of this matter**
 5. **Prohibit LTD from providing charter service for the OCF under §604.9**
 6. Grant such other relief as FTA deems appropriate
-

8. Supporting Documentation

Supporting documents are attached and include:

- Charter notice and response
 - Leasing request and LTD denial
 - Follow-up correspondence
 - Communications with OCF
 - Communications with private operators
 - Operational analysis
 - LTD advisory opinion submission
-

9. Certification

I certify that the information provided in this complaint is true and correct to the best of my knowledge.

Signed:



Kumar Shah
President, Pronto Journeys

Exhibit C.3

Re: Lane Transit District-Request for Advisory Opinion Form and Request for EXPEDITED Advisory Opinion

From Charterservice Ombudsman (FTA) <ombudsman.charterservice@dot.gov>

Date Tue 2026-04-28 07:01

To Patrick Fiedler <Patrick.Fiedler@ltd.org>

Cc Kumar Shah <kumar@prontojourneys.com>; kbolton@oregoncountryfair.org <kbolton@oregoncountryfair.org>; hollie@starlinecollection.com <hollie@starlinecollection.com>; Carmen Jackson-Brown <Carmen.Jackson-Brown@ltd.org>; Miller, Micah (FTA) <micah.miller@dot.gov>; Lynch, John (FTA) <john.lynch@dot.gov>

Dear Mr. Fiedler:

Re: Advisory Opinion 2026-01

On April 7, 2026, Lane Transit District requested an Advisory Opinion from the Federal Transit Administration (FTA) on two issues: 1) the requirements for leasing a vehicle to a charter provider pursuant to 49 CFR 604.8, and 2) when a grantee may step in and provide charter service if a charter provider does not follow up on the initial notice of interest in 49 CFR 604.9. On April 13, 2026, Pronto Charter Service Company (Pronto) responded to the request for an Advisory Opinion claiming that LTD failed to provide adequate justification for its denial of Pronto's lease request and that LTD was therefore required to lease its vehicles to Pronto.

LTD's request for an advisory opinion is denied. **An advisory opinion is not necessary in this instance, as the questions asked are adequately covered by the charter regulations.** See 49 CFR 604.18(d)(3).

Background

The Oregon County Fair requested service for its 2026 fair, which occurs on July 10, 11, and 12. LTD desires to provide bus service for this event. LTD issued a notice pursuant to 49 C.F.R. § 604.14 for charter transportation services requested by the Oregon State Fair. Two registered charter services submitted a response; one registered charter provider, Pronto, expressed interest but subsequently determined it could not perform the service using its own equipment due to operational constraints and requested to lease LTD's vehicles and potentially operators under § 604.8. LTD denied Pronto's request to lease its vehicles. A second registered charter provider submitted a response to the Notice but failed to follow up with or contact the Oregon State Fair regarding the service.

LTD is seeking clarity regarding its ability to deny Pronto's lease request and its ability to step back in and provide the service. As noted above, 49 CFR § 604.8 and Q&A's in 49 CFR 604 Appendix C adequately address these questions.

49 CFR § 604.8 provides in pertinent part that:

(a) A recipient may lease its FTA funded equipment and drivers to registered charter providers for charter service only if the following conditions exist:

- (1) The private charter operator is registered on the FTA charter registration Web site;
- (2) The registered charter provider owns and operates buses or vans in a charter service business;

- (3) The registered charter provider received a request for charter service that exceeds its available capacity either of the number of vehicles operated by the registered charter provider or the number of accessible vehicles operated by the registered charter provider; and
- (4) The registered charter provider has exhausted all of the available vehicles of all registered charter providers in the recipient's geographic service area.

<https://www.transit.dot.gov/regulations-and-guidance/access/charter-bus-service/charter-bus-service-rule-and-guidance>

Since the regulations give the recipient discretion to lease a federally-funded asset to a private operator (or not), FTA is not implicated further in these decisions, nor can it require a recipient to lease its equipment to private operators. It is a local decision. Whether a recipient wishes to lease its vehicles to a private charter operator is entirely up to the recipient. **In other words, the regulations do not require a recipient to lease its vehicles to a private charter operator.**

As to the second question raised by LTD regarding when it may step back in and perform the service if a charter provider expresses interest. 49 CFR 604 Appendix C, question 49 addresses this scenario.

(49) Q: What happens if a registered charter provider indicates interest in providing the service, but then does not contact the customer?

A: A transit agency may step back in and provide the service if the registered charter provider was the only one to respond affirmatively to the notice.

<https://www.govinfo.gov/content/pkg/CFR-2011-title49-vol7/pdf/CFR-2011-title49-vol7-part604-appC.pdf>

In this instance, two charter providers responded to the initial notice for service. The first provider, Pronto, does not have the necessary vehicles to provide the service. The second provider never contacted the Oregon State Fair to discuss the terms of the service. Therefore, LTD is allowed to step back in and provide the service.

Sincerely,



Kathy Breeden
CHARTER OMBUDSMAN
Office of Chief Counsel
Federal Transit Administration
U.S. Department of Transportation
Ombudsman.Charterservice@dot.gov

On Tue, Apr 7, 2026 at 6:06 PM Patrick Fiedler <Patrick.Fiedler@ltd.org> wrote:

Lane Transit District hereby submits the attached **Request for Advisory Opinion Form and Request for Expedited Advisory Opinion Pursuant to 49 C.F.R. § 604.18**, concerning the application of 49 C.F.R. §§ 604.8 and 604.9 (Charter Services).

An original version of both documents has also been electronically filed under docket number FTA-2007-0023 at <http://www.regulations.gov>.

Please let us know if any additional information is required. Thank you for your consideration.

Patrick Fiedler

Compliance | Senior Paralegal

P: 541-682-3224



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Exhibit C.4

Re: Request for Immediate Chief Counsel Review, Procedural Intervention, and Clarification – Oregon Country Fair Charter Service Complaint

From Charterservice Ombudsman (FTA) <ombudsman.charterservice@dot.gov>

Date Tue 2026-06-09 09:12

To Kumar Shah <kumar@prontojourneys.com>

Cc Cahill, Matthew (FTA) <matthew.cahill@dot.gov>; ftaregion10@dot.gov <ftaregion10@dot.gov>; FTARegion9 <ftaregion9@dot.gov>; Schiff_California@schiff.senate.gov <Schiff_California@schiff.senate.gov>; scheduling_padilla@padilla.senate.gov <scheduling_padilla@padilla.senate.gov>; OPL@dot.gov <OPL@dot.gov>; Transportation.RegulatoryInfo@dot.gov <Transportation.RegulatoryInfo@dot.gov>; Blair_Taylor@commerce.senate.gov <Blair_Taylor@commerce.senate.gov>; Tricia_Enright@commerce.senate.gov <Tricia_Enright@commerce.senate.gov>; Rob_Blumenthal@commerce.senate.gov <Rob_Blumenthal@commerce.senate.gov>; Miller, Micah (FTA) <micah.miller@dot.gov>; Lynch, John (FTA) <john.lynch@dot.gov>; AnStraus, Noah (FTA) <noah.anstraus@dot.gov>; Jamie.Pfister@dot.gov <Jamie.Pfister@dot.gov>; Nifosi, Dana (FTA) <dana.nifosi@dot.gov>

Mr. Shah, Pursuant to 49 CFR Part 604, the Charter Ombudsman serves as the official liaison for Federal Transit Administration (FTA) leadership (cc'd on this, and previous, email(s)) and is authorized to speak on their behalf. To ensure regulatory compliance and consistent agency interpretation, all Charter Ombudsman responses are drafted and reviewed within FTA's Office of Chief Counsel. Our team has thoroughly evaluated and addressed your concerns. While we understand you may disagree with the final outcome, the FTA considers the Oregon County Fair matter closed. Thank you, Charter Ombudsman

On Fri, Jun 5, 2026 at 12:24 PM Kumar Shah <kumar@prontojourneys.com> wrote:

FTA Charter Ombudsman,

Thank you for your response.

However, I believe your response highlights the very concern that prompted my most recent filing.

My letter was not addressed to the Charter Ombudsman. It was addressed to Chief Counsel of the Federal Transit Administration, and copied to the Secretary of Transportation, FTA leadership, Congressional offices, and others because I no longer have confidence that the issues I have raised will receive fair, impartial, and comprehensive consideration through the Charter Ombudsman process.

To date, neither the Chief Counsel nor any other FTA leadership official has responded to my filing.

Instead, the Charter Ombudsman has once again responded on their behalf while leaving unanswered the central questions raised in my submission.

Most importantly, your response does not address the substance of my complaint regarding Lane Transit District (LTD).

Specifically:

- Pronto submitted an affirmative response to LTD's Charter Notice.
- Pronto never withdrew that response.

- Pronto repeatedly advised LTD, Oregon Country Fair, and FTA that it remained ready, willing, and able to provide the service.
- Pronto submitted multiple operating alternatives to Oregon Country Fair.
- Pronto's affirmative response to the Charter Notice remains active today.

Your response does not identify any authority under 49 U.S.C. § 5323(d) or 49 C.F.R. Part 604 that permits FTA, the Charter Ombudsman, or LTD to disregard an active response to a Charter Notice submitted by a registered charter provider.

Likewise, your response does not identify any authority permitting FTA to determine the viability of Pronto's proposal and, based on that determination, effectively remove Pronto from the Charter Rule process and to do with a complete misrepresentation of facts that Pronto is unable to perform the service when we have presented detailed documentation of our plans to perform the service.

Congress did not grant FTA or the Charter Ombudsman authority to substitute their judgment for that of the customer or the marketplace regarding the merits, viability, or competitiveness of a proposal submitted by a private charter operator.

Those decisions belong to the customer, provided the responding operator remains ready, willing, and able to perform the service.

Furthermore, Pronto's complaint challenged LTD's conduct, LTD's interference with the Charter Rule process, LTD's efforts to reclaim a service after issuing a Charter Notice, and FTA's authority to permit LTD to do so. None of those issues were addressed in either the January 20 correspondence or the April 28 response to LTD's advisory opinion request.

Accordingly, I respectfully disagree with your assertion that my complaint has been addressed.

The concerns raised in my filing to the Chief Counsel extend well beyond the LTD matter and include serious questions regarding the administration of the Charter Rule, the authority exercised by the Charter Ombudsman, the treatment of private operators under the Charter Rule process, and FTA's recent interpretations in the LTD, VTA, and SCCTD matters.

For those reasons, I continue to request a response from the Chief Counsel and FTA leadership.

Until such response is received, Pronto does not consider these matters resolved. We will not be engaging with the FTA Charter Ombudsman on the LTD, SCCTD, VTA and other matters we have already brought to your attention because we have no faith in your process and that they will receive fair, impartial, and comprehensive consideration through the Charter Ombudsman process.

Respectfully,

Kumar Shah
President & CEO
Pronto Corporation / Pronto Journeys
FTA Charter Registration ID: 6643

From: Charterservice Ombudsman (FTA) <ombudsman.charterservice@dot.gov>

Sent: Wednesday, June 03, 2026 06:54

To: Kumar Shah <kumar@prontojourneys.com>

Cc: Cahill, Matthew (FTA) <matthew.cahill@dot.gov>; ftaregion10@dot.gov <ftaregion10@dot.gov>; FTAREgion9 <ftaregion9@dot.gov>; Schiff_California@schiff.senate.gov <Schiff_California@schiff.senate.gov>; scheduling_padilla@padilla.senate.gov <scheduling_padilla@padilla.senate.gov>; OPL@dot.gov <OPL@dot.gov>; Transportation.RegulatoryInfo@dot.gov <Transportation.RegulatoryInfo@dot.gov>; Blair_Taylor@commerce.senate.gov <Blair_Taylor@commerce.senate.gov>; Tricia_Enright@commerce.senate.gov <Tricia_Enright@commerce.senate.gov>;

Rob_Blumenthal@commerce.senate.gov <Rob_Blumenthal@commerce.senate.gov>; Miller, Micah (FTA) <micah.miller@dot.gov>; Lynch, John (FTA) <john.lynch@dot.gov>; AnStraus, Noah (FTA) <noah.anstraus@dot.gov>

Subject: Re: Request for Immediate Chief Counsel Review, Procedural Intervention, and Clarification – Oregon Country Fair Charter Service Complaint

Dear Mr. Shah:

The substantive issues you raised have been addressed twice. We emailed you a response regarding the leasing "question" on January 20, 2026. We issued a second response on April 28, 2026 concerning Lane Transit's April 7 request for an Advisory Opinion (after you submitted your current complaint on April 26, 2026). As you note, you were copied on that email response, which explicitly covers the Oregon Country Fair Shuttle fact pattern. Although we thought it was clear pursuant to the timing of our Advisory Opinion response, we will make it abundantly clear now, because these previous responses answered the substantive portion of your complaint, pursuant to 49 CFR § 604.28(b), this matter requires no further action by the FTA.



Kathy Breeden
CHARTER OMBUDSMAN
Office of Chief Counsel
Federal Transit Administration
U.S. Department of Transportation
Ombudsman.Charterservice@dot.gov

On Mon, Jun 1, 2026 at 5:00 PM Kumar Shah <kumar@prontojourneys.com> wrote:

To: FTA Office of Chief Counsel

Cc: FTA Charter Ombudsman; FTA Region 10; Lane Transit District; Oregon Country Fair, VTA, FTA Region 9

Cc: Ron Wyden & Jeff Merkley (Oregon - US Senators)

Cc: Alex Padilla & Adam Schiff (California - US Senators)

Cc: Sean Duffy, Secretary, US Department of Transportation - Office of Public Liaison

Cc: US Committee on Commerce, Science and Transportation - Transportation Regulatory Affairs

Dear Chief Counsel / Matt Cahill,

Attached please find Pronto Corporation's Request for Immediate Chief Counsel Review, Procedural Intervention, and Clarification regarding our pending complaint against Lane Transit District under 49 C.F.R. Part 604.

As detailed in the attached filing, Pronto submitted a formal complaint on April 12, 2026. To date, we have not received acknowledgment, status information, or a substantive response regarding that complaint. In contrast, LTD's Request for Advisory Opinion received a substantive response from the Charter Ombudsman that effectively authorized LTD to proceed with the same charter service that is the subject of our complaint.

The Oregon Country Fair event is now less than sixty days away. As a practical matter, the value of the complaint process will be lost if these issues are not addressed before the service is implemented.

We respectfully request expedited review and written clarification regarding the issues identified in the attached filing, including the status of our complaint, the applicability of Appendix C Question 49, and LTD's authority to proceed while the complaint remains unresolved.

Thank you for your attention to this matter. We look forward to your response.

Respectfully,

Kumar Shah
President & CEO
Pronto Corporation / Pronto Journeys
FTA Charter Registration ID: 6643

From: Kumar Shah <kumar@prontojourneys.com>
Sent: Sunday, April 26, 2026 17:19
To: Charterservice, Ombudsman (FTA) <ombudsman.charterservice@dot.gov>
Cc: Eric.Breitenstein@ltd.org <Eric.Breitenstein@ltd.org>;
ftaregion10@dot.gov <ftaregion10@dot.gov>; Bret Smith <bret.smith@ltd.org>;
dave.roth@ltd.org <dave.roth@ltd.org>; 'Heather Lindsay' <heather.lindsay@ltd.org>;
kbolton@oregoncountryfair.org <kbolton@oregoncountryfair.org>;
patrick.fiedler@ltd.org <patrick.fiedler@ltd.org>;
jameson.auten@ltd.org <jameson.auten@ltd.org>
Subject: Emergency Request for Expedited Review and Preliminary Findings

To: Federal Transit Administration, Office of the Chief Counsel

In Re: Complaint against Lane Transit District (LTD) regarding Oregon Country Fair (OCF) Shuttle

Date: April 26, 2026

Complainant, Pronto Corporation ("Pronto"), hereby moves the Federal Transit Administration (FTA) for an **Emergency Expedited Review** of the pending complaint against Lane Transit District ("LTD"). This supplement provides evidence of a documented pattern of violations by Lane Transit District (LTD) and highlights "Bad Faith" actions currently being taken to interfere with a private operator's ability to provide service.

I. URGENCY AND IRREPARABLE HARM

The Oregon Country Fair (OCF) is scheduled to commence in approximately 80 days. A standard 75-day investigation period will effectively render this matter moot, as the operational window for securing vehicles, drivers, and logistics will close long before a final determination is reached. LTD is strategically utilizing this regulatory lag to manufacture a "service gap," pressuring the event organizer to abandon a private operator in favor of LTD's non-compliant, taxpayer-subsidized service.

II. PATTERN OF VIOLATIONS: THE 2024 TRIENNIAL REVIEW

LTD is currently under a **Corrective Action Plan** following the FTA's 2024 Triennial Review, which found LTD in violation of Charter Bus Service regulations. Specifically, the FTA flagged the **Butte-to-Butte shuttle** for:

- Providing exclusive service for a third-party event.
- Utilizing federally funded assets to compete with private operators.
- Operating under a "public service" label to bypass § 604 requirements.

LTD's current actions regarding the OCF shuttle are a direct continuation of these deficiencies. Despite being ordered to correct their policies, LTD is once again attempting to seize an event-specific shuttle market through exclusion and interference.

III. EVIDENCE OF SYSTEMIC NON-COMPLIANCE (RECIDIVISM)

Under 49 CFR § 604.27, an agency may be penalized for providing misleading information or acting in bad faith to discourage private participation. We submit the following:

- **Operational Interference:** LTD staff have actively "coached" OCF organizers regarding tree-trimming requirements along the shuttle route. This is a targeted effort to create an artificial barrier to entry for Pronto's motor coaches, pressuring the client to believe only LTD's smaller transit buses can navigate the route.
- **Admissions of Intent:** In a phone conversation, LTD's Bret Smith explicitly instructed Pronto to contact him "immediately" once a decision is made to withdraw, so that LTD can "step back in." This demonstrates that LTD's goal is not to facilitate a compliant solution, but to wait for a private operator's exit—which they are actively trying to manufacture.

IV. REFUSAL TO ENGAGE AND MISUSE OF ADVISORY PROCESS

Despite Pronto's diligent efforts to reach a collaborative resolution, LTD leadership has demonstrated a clear intent to prioritize agency-run service over regulatory compliance:

- **Rejection of § 604.8 Leasing:** On April 20, 2026, Pronto CEO Kumar Shah reached out to LTD President Jameson Auten to propose a compliant solution: leasing LTD equipment and operators to Pronto (pursuant to **49 CFR § 604.8**). This would have allowed the event to proceed seamlessly while respecting the Charter Rule. OCF / Kirsten Bolton had already expressed a desire for Pronto and LTD to work out the leasing arrangement to allow the OCF shuttle service to move forward. Instead of looking for a way to proceed with leasing of the equipment and drivers to Pronto - per 49 CFR 604.8 - LTD communicated to Ms. Bolton that LTD will not be leasing the equipment to Pronto. LTD declined Pronto's request for leasing without citing the reasons for the same. Instead, LTD chose to file an Advisory Opinion request to the FTA regarding leasing of equipment to Pronto.
- **Procedural Stalling:** Mr. Auten's response—stating that LTD is seeking "guidance" from the FTA rather than engaging in a lease—is a transparent stalling tactic. By refusing to lease to a willing and able private provider, LTD is creating a "service gap" that they intend to fill themselves.
- **The "Hostile Takeover" Strategy:** LTD's refusal to engage with Pronto, combined with their internal directives to OCF regarding tree-trimming and their explicit request to be notified of Pronto's withdrawal, reveals a coordinated strategy to manufacture a "failure" of the private sector to justify their own illegal entry into the market

V. Failure to Implement Mandatory Corrective Actions and Training

LTD's current conduct regarding the OCF shuttle represents a failure of the Corrective Action Plan (CAP) mandated by the FTA following the 2024 Triennial Review.

- **Ineffectiveness of Mandatory Training:** Although LTD compliance staff were required to attend specialized FTA Charter Bus Workshops, their current actions show a blatant disregard for the core principles taught in those sessions—specifically the prohibition of utilizing public assets to compete with private operators for third-party events.
- **Recidivism:** By repeating the exact patterns identified in the Butte-to-Butte violation (negotiated pricing for a third party and exclusion of private providers), LTD is demonstrating that its previous "commitment" to compliance was merely performative.
- **Willful Non-Compliance:** The fact that LTD is currently "seeking clarification" from the FTA on a matter they were just trained on suggests a bad-faith attempt to re-litigate settled rules rather than a genuine misunderstanding of the law.

VI. RELIEF REQUESTED

In light of the imminent nature of the event and the documented pattern of bad faith, Pronto respectfully requests that the FTA:

- 1. **Expedite the Response Deadline:** Order LTD to respond to this complaint within **10 business days**.
- 2. **Issue a Preliminary Notice of Investigation:** Formally advise LTD that providing OCF shuttle service while a qualified private provider is willing and able to lease equipment constitutes a willful violation of the Charter Rule.
- 3. **Regional Oversight:** Direct FTA Region 10 Counsel to oversee all OCF-related communications from LTD to ensure no further interference with private contracts occurs.

Best regards,
Kumar Shah
President & CEO
FTA Charter ID 6643



From: Kumar Shah
Sent: Monday, April 13, 2026 2:07 AM
To: Charterservice, Ombudsman (FTA) <ombudsman.charterservice@dot.gov>
Cc: ftaregion10@dot.gov <ftaregion10@dot.gov>; Bret Smith <bret.smith@ltd.org>; dave.roth@ltd.org <dave.roth@ltd.org>; Eric.Breitenstein@ltd.org <Eric.Breitenstein@ltd.org>; 'Heather Lindsay' <heather.lindsay@ltd.org>; kbolton@oregoncountryfair.org <kbolton@oregoncountryfair.org>; patrick.fiedler@ltd.org <patrick.fiedler@ltd.org>; jameson.auten@ltd.org <jameson.auten@ltd.org>
Subject: Response to Request for Advisory Opinion – Oregon Country Fair Shuttle Service (Pronto Journeys)

Dear Charter Ombudsman / Regional Administrator,

Please find attached Pronto Journeys’ formal response to the Request for Advisory Opinion submitted by Lane Transit District (LTD) on April 7, 2026, concerning the Oregon Country Fair (OCF) shuttle service.

We are also submitting herewith, in parallel, a formal complaint under 49 C.F.R. Part 604 addressing LTD’s denial of leasing under §604.8, its stated intent to provide the service under §604.9, and related actions that have materially affected the Charter Service process.

As detailed in the attached submission, this matter arises from a specific and time-sensitive set of facts involving:

- A registered charter provider that responded affirmatively and remains ready, willing, and able to perform the service;

- A recipient's denial of access to federally funded equipment under §604.8 without identifying any unmet regulatory condition; and
- The recipient's subsequent position that it may provide the same service directly.

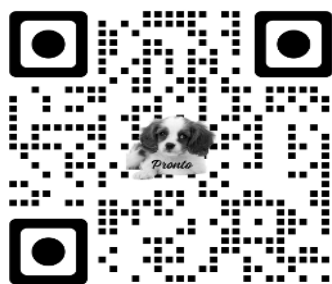
We respectfully submit that this presents a concrete and non-hypothetical application of the Charter Service Rule, with immediate implications for the availability of shuttle service for the Oregon Country Fair.

Given the proximity of the event and the need for operational certainty, we respectfully request expedited consideration of both the advisory response and the accompanying complaint.

We would welcome the opportunity to provide any additional information or supporting materials that may assist in your review.

Thank you for your attention to this matter.

Respectfully,
Kumar Shah
President
Pronto Corporation
FTA Charter Registration ID: 6643



Scan me to watch me in action



Pronto Journeys

Safe. Dependable. Comfortable.

Group Transportation since 2005
60K+ Trips. 2.4M+ Passengers.
100% Injury-free

RATING: 4.93 / 5.0

★★★★★





Kumar Shah, President

+1-650-249-7418
Kumar@ProntoJourneys.com
84 W Santa Clara St, Ste 700
San Jose, CA 95113

From: no-reply@regulations.gov <no-reply@regulations.gov>
Sent: Wednesday, April 8, 2026 5:00 PM
To: regulationshelpdesk@gsa.gov
Subject: Regulations.gov - Scheduled Notification for FTA-2007-0023

The following information describes the docket you have subscribed to, and what updates have occurred for the docket. If you want to view the docket, click the Docket ID link.

Docket Information

Subscribed Docket: [FTA-2007-0023](#)

Notification Frequency: Daily

Number of Documents: 2

Document Information

The documents listed below are the documents within the subscribed docket that have been added, modified, or withdrawn. Please click on the associated Document ID link if you wish to view a specific document within Regulations.gov.

Document ID: [FTA-2007-0023-0089](#)

Document Title: Request for Advisory Opinion and Cease and Desist Order 2/11/2009

Document Type: Other

Date Posted: 2009-03-10T04:00:00Z

Document ID: [FTA-2007-0023-0195](#)

Document Title: Advisory Opinion- Lane Transit District

Document Type: Other

Date Posted: 2026-04-08T04:00:00Z

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Exhibit C.5

Pursuant to **49 CFR Part 604, Subpart F, § 604.27**, Pronto Corporation formally files this **Notice of Charter Service Complaint** against Lane Transit District (LTD).

I affirm that the undersigned swears, to the best of his knowledge and belief, this complaint includes all data, information, and views relevant to this matter, whether favorable or unfavorable to the position of the undersigned, which is the subject of this complaint.

I hereby certify that I have on this day served the foregoing **Notice of Charter Service Complaint** on the following persons by:

US Mail:

Lane Transit District (LTD)
Jameson Auten, Chief Executive Officer
3500 E 17th Avenue, Eugene, OR 97403

The Oregon Country Fair
Attn: Kristen Bolton
442 Lawrence St
Eugene, OR 97401

Email:

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FTA Electronic Filing: Docket FTA-2007-0023 at <http://www.Regulations.gov>

Dated 29th day of June 2026
Pronto Corporation



Kumar Shah
President, CEO and Chairman
84 W Santa Clara St, Suite 700, San Jose, CA 95113

**BEFORE THE FEDERAL TRANSIT ADMINISTRATION
OFFICE OF THE CHIEF COUNSEL
PRONTO CORPORATION
(Accelar, Inc., FTA Charter Registration ID: 6643)
Complainant,
v.
LANE TRANSIT DISTRICT (LTD)
Respondent.**

DATE: June 29, 2026

Dear Chief Counsel and Charter Service Ombudsman,

Re: Notice of Charter Service Complaint against Lane Transit District (LTD)

Pursuant to **49 CFR Part 604, Subpart F, § 604.27**, Pronto Corporation formally files this **Notice of Complaint** against Lane Transit District (LTD).

Pronto Corporation ("Pronto") hereby formally submits this preamble to clarify the procedural posture of our filings and to establish a clean, indisputable regulatory track under **49 CFR Part 604, Subpart F**.

Pronto acknowledges that our initial market interference complaint, dated April 12, 2026, was appended as evidentiary exhibits to our response to Lane Transit District's (LTD) Request for an Advisory Opinion. Our subsequent filings and subsequent emergency supplements, dated April 26, 2026 (**Exhibit A.1**), and June 1, 2026 (**Exhibit A.6**) were also submitted via e-mail but did not follow the proper filing requirements specified in 604.27.

Because those submissions were procedurally swept into the informal, non-binding review track of **Subpart E**, the FTA subsequently issued an ad-hoc administrative determination on April 28, 2026 (**Exhibit A.4**), followed by a closure notification on June 9, 2026 (**Exhibit A.7**), without opening a tracked investigation. The Ombudsman asserted that because the advisory track was addressed, the substantive complaint required "no further action".

Because of this filing discrepancy of our complaint, the central allegations of predatory bad faith and carrier exclusion have never been formally investigated, docketed, or adjudicated by the Office of Chief Counsel.

To cure any past procedural deficiencies, **Pronto is now officially filing this Formal Complaint in accordance with 49 CFR § 604.27.**

Per **49 CFR § 604.29**, we request you to docket this Complaint packet, assign a new sub-number within the master **Docket ID: FTA-2007-0023**, and require LTD to file a formal legal answer urgently since the start date for the OCF is July 10, 2026.

Pronto has fully met every filing requirement, including the simultaneous service mandate to the Respondent under **§ 604.31**.

We request that the FTA process this filing immediately, recognize that the OCF matter is not closed until this cured complaint is adjudicated on its merits.

Because the OCF Shuttle Service is scheduled to commence on **July 10, 2026**, Pronto requests an **Expedited Investigation** to avoid disruption of the shuttle service and to the faregoers.

Concurrent with this filing, a true copy of this packet is being served directly upon the Respondent's Chief Executive Officer (CEO) via electronic mail, satisfying **49 CFR § 604.31**.

We await your formal Docket ID notification and the immediate issuance of a response.

Prior Notice to Lane Transit District

Although Pronto recognizes that its April 12, 2026, complaint submission did not follow the process outlined in 602.27, LTD nevertheless received that submission contemporaneously.

Accordingly, beginning on April 12, 2026, LTD had actual notice that:

- Pronto disputed LTD's interpretation and application of 49 CFR Part 604;
- Pronto asserted that it remained ready, willing, and able to provide the Oregon Country Fair service;
- Pronto objected to LTD's efforts to reclaim the service; and
- Pronto alleged that LTD's conduct was inconsistent with the Charter Rule.

LTD therefore cannot reasonably contend that it lacked notice of either the factual allegations or the legal issues raised by Pronto. Despite receiving that notice nearly three months before the scheduled event, LTD continued preparations to operate the service without taking corrective action or attempting to resolve the issues raised.

This Complaint is filed to invoke the formal procedures of Subpart F and obtain an adjudication of those issues on their merits.

This Complaint concerns the conduct of Lane Transit District as a recipient of Federal transit assistance and requests a determination under 49 CFR Part 604 regarding LTD's compliance with the Charter Service Rule. This Complaint does not seek review of FTA's April 28, 2026, advisory determination, which Pronto intends to address separately through a petition for administrative reconsideration.

This Complaint is directed solely to LTD's conduct as a recipient of Federal transit assistance. Pronto reserves all rights with respect to FTA's April 28, 2026, determination, which will be addressed in a separate administrative filing.

While a properly filed complaint remains pending, LTD should not continue to rely upon the April 28 determination as conclusive authority to operate the service because that determination itself is the subject of a pending request for reconsideration.

Respectfully submitted,



Kumar Shah
President, CEO, & Chairman
Pronto Corporation / Accelar, Inc.

CC Via Electronic Mail:

Jameson Auten, Chief Executive Officer, Lane Transit District (LTD)

NOTICE OF FTA CHARTER SERVICE COMPLAINT PURSUANT TO 49 CFR § 604.27

Description of the Complaint

This formal complaint arises under the Federal Transit Administration (FTA) Charter Service Regulations (**49 CFR Part 604**) and **49 U.S.C. § 5323(d)** in connection with the 2026 Oregon Country Fair (OCF) shuttle service.

Accelar, Inc. dba Pronto Corporation ("Pronto"), a registered private charter provider in good standing, responded affirmatively to LTD's public Charter Notice and engaged in continuous good faith to deploy a compliant, demand-responsive transit plan. Despite Pronto satisfying all the conditions set forth in **49 CFR § 604.8(a)**, LTD has committed severe, actionable regulatory violations by:

1. Engaging in bad-faith commercial and administrative interference to systematically force Pronto's withdrawal.
2. Illegally planning to operate the charter corridor directly under **§ 604.9**, despite the presence of an active, responsive, and willing private operator.
3. Arbitrarily denying Pronto's vehicle and driver lease request under **§ 604.8** without identifying any unmet regulatory conditions.
4. Refusing to provide factual support or operational explanations in response to multiple requests for clarification.

These actions violate **49 U.S.C. § 5323(d)**, the open-competition rules of **2 CFR § 200.319**, and the discriminatory procurement prohibitions of **49 U.S.C. § 5323(h)(3)**.

4. Factual Basis

A. Charter Notice and Response

LTD issued a public Charter Notice for the July 10–12, 2026 OCF shuttle service under Part 604. Pronto submitted a timely, affirmative response on January 5, 2026. Pronto's affirmative response remains open, active, and has never been withdrawn.

B. Continuous Engagement and Operational Planning

Pronto and its affiliate, MTR Western, engaged in extensive operational planning with OCF organizers from December 2025 through March 2026 (Exhibits B.1, B.2, B.3, B.4, B.5, B.6, B.7, B.8, B.9, B.10, B.11, B.12). Pronto developed an optimized, demand-responsive configuration built on three years of historical ridership records, cutting OCF's historical transit costs by more than 10%.

Throughout the process, we reaffirmed that we remain ready, willing, and able to perform the service. This was communicated in the email messages to OCF, LTD and FTA on Jan 5, Jan 22, Feb 18, and all other correspondence in March, April, May and June.

C. Proper Invocation of § 604.8 Leasing

When OCF organizers declined to trim low-hanging branches required to clear standard motorcoaches, Pronto presented to OCF organizers the option to use transit buses leased under the regulatory remedy of **49 CFR § 604.8**, requesting to lease LTD's own low-profile transit buses at a published, fully allocated cost. Pronto factually satisfied every required benchmark under § 604.8(a), a status explicitly verified by LTD's own public filings.

D. Discriminatory Denial and Bad-Faith Non-Engagement

On March 3, 2026, LTD Director Dave Roth denied Pronto's leasing request without identifying a single unmet regulatory condition (p. 2). LTD subsequently refused to respond to any operational inquiries. The intent behind this refusal was confirmed on April 20, 2026, when LTD CEO Jameson Auten explicitly wrote: *"LTD's understanding is that we are not required to lease vehicles or people."* LTD willfully weaponized its leasing discretion to manufacture an artificial private sector asset shortage.

E. Documented Record of Tortious Market Interference

Public records requests uncovered an explicit paper trail of collusion designed to freeze Pronto out of the market. On December 24, 2025, LTD Senior Service Planner Bret Smith actively coached OCF Executive Director Kirsten Bolton to maintain the route clearance barriers to force a private failure, writing: *"I suspect when they realize you will not be trimming trees... I am guessing they will pull out... we will need an email of retraction from them in order for LTD to provide the service."*

Additionally, OCF coordinators directly called MTR Western to discourage and dissuade them from participating in the service, directly interfering with private commercial relations.

F. LTD's Reliance on § 604.9

LTD has asserted that it may run the shuttle directly under **49 CFR § 604.9**. However, § 604.9 and its accompanying Appendix C guidance apply *only* if a private operator is non-responsive or withdraws interest. Pronto has repeatedly notified the customer, LTD, and the FTA that it remains ready, willing, and able to operate the OCF Shuttle Services.

5. Violations of 49 CFR Part 604 & Federal Transit Law

A. Improper Denial of § 604.8 Leasing

LTD denied fleet access without identifying any unmet condition under § 604.8(a), blocking a qualified provider from performing the service (p. 2).

B. Procurement Discrimination under 49 U.S.C. § 5323(h)(3)

By offering specialized equipment and labor terms to a third-party non-transit entity (OCF) while blocking a registered private carrier from leasing those identical assets, LTD has engaged in procurement discrimination.

C. Documented Administrative Recidivism

LTD is currently operating under a formal Corrective Action Plan (CAP) issued during the FTA's August 2024 Triennial Review for direct Charter Bus Service violations. The FTA previously caught LTD utilizing public assets under a false "public service" label to run the Butte-to-Butte race shuttle. LTD's current actions are a repeat of the exact deficiencies required by FTA for LTD to correct under their active CAP.

6. Harm and Competitive Injury

LTD's actions have resulted in:

- Direct commercial obstruction of a certified, qualified charter provider.
- Severe reputational harm to Pronto through false claims of market "incapacity".
- A manufactured transit crisis endangering the mobility of OCF fairgoers.
- A dangerous national precedent allowing public entities to ignore active Charter Notice responses.

7. Relief Requested

Pronto Corporation respectfully requests that the FTA Office of Chief Counsel:

1. Determine that LTD has violated **49 CFR Part 604** and **49 U.S.C. § 5323(d)**.
2. Determine whether LTD properly relied upon §604.9 under the facts presented.
3. Determine that LTD's denial of leasing under **§ 604.8** was unsupported and discriminatory and in violation of Equal Access and fairness doctrines.
4. Determine whether LTD violated Part 604.
5. Determine whether LTD properly invoked §604.9.
6. Determine whether LTD properly denied leasing under §604.8.
7. Determine whether LTD's conduct complied with the Charter Notice procedures.
8. Determine whether Pronto's affirmative response remained valid.
9. Order whatever corrective action Part 604 authorizes.

9. Certification

I declare under penalty of perjury that the foregoing information provided in this complaint is true and correct to the best of my knowledge, information, and belief.

Signed:



Kumar Shah
President, CEO, & Chairman
Pronto Corporation / Accelar, Inc.
Dated: June 29, 2026

APPENDIX A: CHRONOLOGICAL DISCOVERY & FILING INDEX

- **Exhibit A.1:** Complainant's Emergency Supplement and Request for Expedited Review filed with the FTA Office of Chief Counsel (Dated April 26, 2026) — *Unadjudicated/Unreviewed by FTA.*
- **Exhibit A.2:** Formal Part 604 Complaint and Interference Memorandum against Lane Transit District filed with the FTA Charter Ombudsman (Dated April 13, 2026) — *Unadjudicated/Unreviewed by FTA.*
- **Exhibit A.3:** Administrative Docket Notification from Regulations.gov verifying receipt and opening of Docket ID: FTA-2007-0023-0195 regarding Lane Transit District (Dated April 8, 2026).
- **Exhibit A.4:** Administrative Determination and Advisory Opinion Email issued by FTA Charter Ombudsman Kathy Breeden (Dated April 28, 2026).
- **Exhibit A.5:** LTD Triennial Review, Butte-to-Butte Charter Services Violations Email from Kumar Shah to Jameson Auten, CEO of LTD (Dated April 26, 2026).
- **Exhibit A.6:** Request for Immediate Chief Counsel Review, Procedural Intervention, and Clarification (Dated June 1, 2026)
- **Exhibit A.7:** Pronto – Ombudsman E-mail (Dated June 9, 2026)

APPENDIX B: CUMULATIVE CUSTOMER TRAIL & CONTRACTUAL HISTORY

- **Exhibit B.1 (March 4, 2026):** Written correspondence from Kirsten Bolton (Executive Director, OCF) to Kumar Shah confirming local route congestion geometry down Clear Lake and Bus Road.
- **Exhibit B.2 (March 4, 2026):** Strategic request from Kumar Shah to OCF proposing an alternative Southern OR-126 access feasibility route to bypass low clearance zones and enable Option 2 (LTD Asset Leasing).
- **Exhibit B.3 (March 3, 2026):** Formal 2026 OCF Shuttle Certainty Notice outlining Option 1 (Pronto absorbing the \$8,000 tree clearance quote) and Option 2 (The \$110,000 fixed-price LTD asset lease).
- **Exhibit B.4 (February 23, 2026):** Formal 2026 OCF Shuttle Proposal Executive Summary, providing detailed peak capacity modeling of 13,860 seats based on a 3-year ridership baseline.
- **Exhibit B.5 (February 22, 2026):** Route Planning Update and dry-run video field logs targeting staging points along Nansleeze Road and Aero Road.
- **Exhibit B.6 (February 18, 2026):** Operational framework overview outlining demand-responsive scaling, vehicle selection parameters, and baseline modeling inputs sent to OCF.
- **Exhibit B.7 (February 16, 2026):** Detailed update letter analyzing historical passenger statistics (\$123,301 spent in 2025) and introducing Pronto's nationwide network of operators.
- **Exhibit B.8 (January 22, 2026):** Due diligence follow-up confirming Pronto's commitment to strict vendor compliance, cost sensitivities, and reliability metrics.
- **Exhibit B.9 (January 21, 2026):** Progress response to OCF reviewing the first financial production of historical transit records from the LTD Finance and Operations teams.
- **Exhibit B.10 (January 9, 2026):** Written confirmation from Kirsten Bolton acknowledging scheduling of regional discovery tracks.
- **Exhibit B.11 (January 5, 2026):** Transmittal of the formal email confirmation indicating Pronto's affirmative response to the LTD Charter Notice under 49 CFR § 604.14.
- **Exhibit B.12 (December 30, 2025):** Initial intake notification from Kirsten Bolton welcoming direct coordination to evaluate private sector capabilities.